

# Exhibit G

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SHABTAI SCOTT SHATSKY, et al., )  
 )  
Plaintiffs, )  
 )  
v. ) Civil Action No.  
 ) 1:02-CV-02280 (RJL)  
THE SYRIAN ARAB REPUBLIC, et al., )  
 )  
Defendants. )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF

IBRAHIM DAHBOUR

JERUSALEM, ISRAEL

SEPTEMBER 12, 2012

REPORTED BY: AMY R. KATZ, RPR

SEPTEMBER 12, 2012 - IBRAHIM DAHBOUR

Videotaped deposition of IBRAHIM DAHBOUR,  
taken in the above-entitled cause pending in the  
United States District Court for the District of  
Columbia, pursuant to notice, before AMY R. KATZ, RPR,  
at the American Colony Hotel, Pasha Room, Jerusalem,  
Israel, on Wednesday, the 12th day of September, 2012,  
at 9:29 a.m.

APPEARANCES:

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4 DOV RABINOVITCH, Official Arabic Interpreter

5 ALBERT AGHAZARIAN, Official Arabic Interpreter

6 GEORGE HAZOU, Check Arabic Interpreter

7 MORDECHAI HALLER, Advocate

8 AVI LEITNER, Advocate

9 RACHEL WEISAR, Advocate

10 ARIEH SPITZEN

11 NOA MERIDOR

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## I N D E X

## WITNESS

Ibrahim Dahbour

## EXAMINATION

PAGE

By Mr. Schoen

10

## E X H I B I T S

## LETTER

## DESCRIPTION

MARKED

Exhibit A

Extract from GIS File  
(Bates 07:000051 to 07:000054)

70

Exhibit B

Extract from GIS File  
(Bates 07:000063 to 07:000067)

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## S E A L E D E X H I B I T S

## NUMBER

## DESCRIPTION

MARKED

Exhibit 1

Narrative Statement, Page 1  
(Retained by Counsel)  
(No Bates Number)

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Exhibit 1A

Narrative Statement, Page 2  
(Retained by Counsel)  
(No Bates Number)

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## Q U E S T I O N S I N S T R U C T E D

## N O T T O A N S W E R

(None.)

## P R O C E E D I N G S

THE VIDEOGRAPHER: This is the videotape deposition of Ibrahim Dahbour, taken by David Schoen, in the matter of Shatsky versus Syrian Arab Republic, at the Colony Hotel, Jerusalem, Israel, on September 12, 2012.

The court reporter is Amy Katz. Mitchell Coopersmith is the videographer.

Will the counsel now state your appearance.

MR. SCHOEN: Yeah, we've also just been saying who else is in the room.

So I'll say on our side, I'm David Schoen. Mordechai Haller is here -- excuse me -- Avi Leitner. The translators are here -- I'll just announce that each day -- Albert and Dov. They're not in the room this second, but they were and they will be. Two other people, Noa Meridor and Arie Spitz. They've been here for other depositions as well. Those are the people identified earlier as consulting experts. That's it for our side.

MR. HIBEY: Richard Hibey and Timothy O'Toole, for the defendants, with our check translator, George Hazou.

Before we get started, could somebody tell me,

09:30:36 1 now that Mr. Haller is in the room, what the intentions  
09:30:41 2 are with respect to the witnesses of the day?

09:30:48 3 MR. HALLER: Mr. Schoen will.

09:30:49 4 MR. SCHOEN: Okay. As I said before we went  
09:30:51 5 on the record -- but Mr. Haller wasn't here -- I worked  
09:30:55 6 last night pretty hard to streamline things so that --

09:31:01 7 I think he should get a translation.

09:31:07 8 OFFICIAL INTERPRETER RABINOVITCH: It's okay.  
09:31:07 9 I can translate.

09:31:07 10 MR. SCHOEN: Okay. Okay.

09:31:08 11 OFFICIAL INTERPRETER RABINOVITCH: I can  
09:31:08 12 translate for him, just I wouldn't disturb you, yeah?

09:31:11 13 MR. SCHOEN: No, no, you're not disturbing me.

14

15 (The following proceedings were conducted  
16 through the Official Arabic Interpreters,  
17 unless otherwise indicated.)

18

09:31:14 19 MR. SCHOEN: -- to streamline things last  
09:31:14 20 night to move quickly through the witnesses.

09:31:17 21 On Dr. Swailem, who I may have mentioned  
09:31:20 22 yesterday, we may be able to forego. Mr. Haller raised  
09:31:24 23 with me the point that we don't know who Dr. Swailem is,  
09:31:29 24 frankly, anything about him other than his name. And  
09:31:32 25 we wanted to know something about who he is, what his

09:31:36 1 background is, before we made the decision as to how  
09:31:39 2 to proceed or whether to proceed with him. So that --  
09:31:41 3 that's the best answer I can give about him.

09:31:45 4 Doctor -- Mr. Shaqbu'a, again, I hate for you  
09:31:50 5 to rely on my representation entirely about time, but  
09:31:54 6 I do not anticipate a long deposition.

09:31:57 7 And as I understand it, the -- what  
09:32:00 8 Mr. McAleer wrote in his e-mail last night was that  
09:32:04 9 rather than having Dr. Shaqbu'a sitting in a spot,  
09:32:09 10 just waiting --

09:32:10 11 MR. HIBEY: Dr. Swailem.

09:32:11 12 MR. O'TOOLE: Dr. Shaqbu'a?

09:32:11 13 MR. SCHOEN: Mr. Shaqbu'a. Either -- this  
09:32:11 14 is --

09:32:12 15 MR. O'TOOLE: Mr. Shaqbu'a.

09:32:13 16 MR. HIBEY: I'm sorry. He said "doctor."

09:32:15 17 MR. SCHOEN: Yes. Shaqbu'a, the third witness  
09:32:18 18 today.

09:32:20 19 MR. HIBEY: Yes.

09:32:20 20 MR. SCHOEN: Mr. McAleer said that it would  
09:32:22 21 be more convenient for him to just sort of be on call  
09:32:26 22 so that, if we told him now we're ready for him, he  
09:32:27 23 would require just 30 to 45 minutes to produce him.  
09:32:30 24 And I think he's being produced in Amman, Jordan,  
09:32:34 25 actually.



09:32:35 1 MR. HIBEY: Correct.

09:32:41 2 MR. SCHOEN: And then -- I don't know if you  
09:32:41 3 have the mike on.

09:32:42 4 And then Dr. Swailem, my understanding is he's  
09:32:44 5 going to be coming from Ramallah. But I intend to tell  
09:32:49 6 you as soon as -- absolutely as soon as possible whether  
09:32:51 7 we're going to need him at all and, if we are going to  
09:32:55 8 need him, how long I would estimate that examination  
09:32:58 9 to be.

09:33:00 10 MR. HIBEY: All right. Just to make it clear,  
09:33:04 11 Dr. Swailem will be testifying from Ramallah.

09:33:09 12 MR. SCHOEN: Yes, sir, sure, by the  
09:33:10 13 videoconference. Both of the other two witnesses today,  
09:33:13 14 if they are called, will be by videoconference.

09:33:17 15 MR. HIBEY: We have Dr. Swailem coming in.  
09:33:21 16 As I understood from yesterday's discussions on the  
09:33:25 17 subject, that it was talked about getting to him in  
09:33:32 18 the twelve o'clock hour. And we will have him in the  
09:33:38 19 site for the taking of the deposition before that time.

09:33:44 20 MR. SCHOEN: Okay. Yes, we were told he would  
09:33:46 21 be produced around twelve o'clock today. We understand  
09:33:49 22 that.

09:33:52 23 MR. HIBEY: He will be there before that.

09:33:53 24 MR. SCHOEN: Okay. All right. The witness  
09:33:54 25 today, Mr. Dahbour.

09:33:58 1 THE VIDEOGRAPHER: The court reporter will  
09:33:58 2 swear in the witness and the interpreters.

09:33:58 3 THE COURT REPORTER: First the interpreters.

4

5

ALBERT AGHAZARIAN

6

-and-

7

DOV RABINOVITCH,

8

the Official Arabic Interpreters, were

9

duly affirmed to translate from English

10

to Arabic and from Arabic to English.

11

12

IBRAHIM DAHBOUR,

13

called as a witness, being first duly

14

affirmed, was examined and testified

15

as hereinafter set forth.

16

09:34:24 17

MR. SCHOEN: Mr. Dahbour, again, based on

09:34:27 18

Mr. McAleer's e-mail, is being produced -- Mr. McAleer's

09:34:32 19

characterization -- I'm reading from an e-mail of

09:34:35 20

September 10th, 2012 -- said that Mr. Dahbour's

09:34:39 21

knowledge will relate to the Kalkilya-specific security

09:34:43 22

issues implicated by Topics 3 and 4 of plaintiffs' PA

09:34:48 23

notice, as well as the Kalkilya-specific security issues

09:34:53 24

raised by Topic 10 of the PA notice.

09:35:00 25

That Kalkilya-specific security issues is not

09:35:05 1 anything that's listed in categories -- those Topics 3,  
09:35:10 2 4, or 10. But I take it to mean by this representation  
09:35:15 3 that Mr. Dahbour's principal area of testimony today  
09:35:19 4 will be on those issues, that is, the Kalkilya-specific  
09:35:23 5 security issues.

09:35:28 6 MR. HIBEY: Yes.

09:35:37 7 THE WITNESS: He informed me that the focus  
09:35:45 8 would be on security issues in Kalkilya.

09:35:47 9  
09:35:47 10 EXAMINATION

09:35:47 11 BY MR. SCHOEN:

09:35:49 12 Q. Okay. Mr. Dahbour, first please pronounce  
09:35:54 13 your name for me so I get it right.

09:35:58 14 A. My name is Ibrahim Dahbour.

09:36:03 15 Q. Dahbour. So I can call you Mr. Dahbour?

09:36:11 16 OFFICIAL INTERPRETER AGHAZARIAN: No problem  
09:36:12 17 with the "H" in English? You can drop it.

09:36:14 18 MR. SCHOEN: Take it easy. I can handle it.

09:36:17 19 Q. BY MR. SCHOEN: Okay. Mr. Dahbour, how old  
09:36:19 20 are you?

09:36:22 21 A. I am born on the 1st of July, '71 --

09:36:26 22 OFFICIAL INTERPRETER RABINOVITCH: '61.

09:36:26 23 OFFICIAL INTERPRETER AGHAZARIAN: "'61."

09:36:26 24 Sorry.

09:36:27 25 THE WITNESS: I am 52 years old -- 51 years

09:36:32 1 old.

09:36:32 2 Q. BY MR. SCHOEN: 51 years young.

09:36:36 3 Where do you live?

09:36:37 4 A. I live in Azun in the governorate of Kalkilya.

09:36:46 5 Q. How long have you lived in Kalkilya?

09:36:47 6 A. All the time.

09:36:52 7 Q. Your whole life?

09:36:56 8 A. (Witness nods head in the affirmative.)

09:36:58 9 Q. Did you go to school in Kalkilya?

09:37:03 10 A. In Azun.

09:37:04 11 Q. That's a nearby town?

09:37:08 12 A. It's nine kilometers. It's the same area,  
09:37:13 13 same district.

09:37:15 14 Q. How far did you go in --

09:37:16 15 MR. HIBEY: Excuse me. Excuse me, Counsel.

09:37:16 16 Could we ask the interpreter, Mr. Rabinovitch --

09:37:19 17 OFFICIAL INTERPRETER RABINOVITCH: Yes?

09:37:20 18 MR. HIBEY: -- to raise his voice?

09:37:24 19 OFFICIAL INTERPRETER RABINOVITCH: Yeah.

09:37:24 20 I'm just trying to translate to be discreet, so I don't  
09:37:25 21 disturb the proceedings.

09:37:26 22 MR. HIBEY: No, I appreciate your discretion.

09:37:29 23 But I've got a check translator down here who wants  
09:37:33 24 to --

09:37:34 25 OFFICIAL INTERPRETER RABINOVITCH: Oh, you

09:37:34 1 want me to speak louder?

09:37:39 2 MR. HIBEY: -- wants to hear it. Yes.

09:37:40 3 OFFICIAL INTERPRETER RABINOVITCH: No problem.

09:37:40 4 No problem.

09:37:40 5 MR. HIBEY: Thank you very much.

09:37:40 6 Q. BY MR. SCHOEN: How far did you go in school?

09:37:45 7 A. In Azun?

09:37:46 8 Q. Any school.

09:37:46 9 What's the most schooling you did?

09:37:50 10 A. I finished my elementary, preparatory, and  
09:37:54 11 secondary studies in Azun. And I did BA in sociology

09:38:00 12 in Bir Zeit University. And I was preparing my

09:38:04 13 Master's -- I had two courses to go. But I dropped  
09:38:09 14 before that.

09:38:10 15 Q. Also at Bir Zeit?

09:38:12 16 A. Yes.

09:38:13 17 Q. And where is Bir Zeit located?

09:38:16 18 A. It's in the Ramallah district, governorate.

09:38:19 19 MR. SCHOEN: I think you knew that already,  
09:38:21 20 Albert.

09:38:27 21 Q. BY MR. SCHOEN: You live in a house or in  
09:38:29 22 an apartment?

09:38:33 23 A. In a house.

09:38:34 24 Q. In a house.

09:38:34 25 Who pays for that house?

09:38:42 1 A. This is a property that I inherited from my  
09:38:45 2 father. It's -- it's mine.

09:38:47 3 Q. Paid for?

09:38:49 4 A. Yes.

09:38:49 5 Q. You have a family?

09:38:54 6 A. I am married. I have four girls and two boys.

09:39:02 7 Q. How are you employed?

09:39:16 8 A. Almost from 1995, I work in the GIS.

09:39:21 9 Q. What's the GIS?

09:39:29 10 A. Its description, meaning?

09:39:33 11 Q. Let me -- let me say for these purposes, if  
09:39:36 12 it's okay, because we've spoken to other witnesses about  
09:39:39 13 this, we'll all refer to GIS as the General Intelligence  
09:39:43 14 Services. Okay.

09:39:51 15 A. It's like the body of the General  
09:39:53 16 Intelligence.

09:39:55 17 Q. GIS is one of the law enforcement agencies?  
09:40:01 18 It's a law enforcement agency?

09:40:09 19 A. It is a security apparatus to gather  
09:40:13 20 information and impose -- imposing law that's through  
09:40:25 21 the tribunate.

09:40:26 22 (Court reporter clarification.)

09:40:28 23 OFFICIAL INTERPRETER AGHAZARIAN: It's through  
09:40:27 24 the tribunate, through the courts.

09:40:28 25 Q. BY MR. SCHOEN: Is the GIS under the PA or the

09:40:33 1 PLO?

09:40:34 2 A. The PA.

09:40:37 3 Q. Okay. Today also, I'm going to use the term  
09:40:41 4 "PA" and "PNA" to mean the same thing, if that's okay  
09:40:47 5 with you.

09:40:55 6 A. I get it.

09:40:56 7 Q. Okay. What were your -- since 1995, you've  
09:41:02 8 worked with the GIS, all the way through today?

09:41:10 9 A. Yes, until today.

09:41:11 10 Q. What did you do for work before 1995?

09:41:18 11 A. I had different works in farming, a regular  
09:41:25 12 worker. That's the areas I worked in.

09:41:29 13 Q. Around the Kalkilya area, always?

09:41:33 14 A. Yes.

09:41:34 15 Q. Did you have some training for the GIS before  
09:41:38 16 you joined the GIS?

09:41:47 17 A. No, I haven't.

09:41:49 18 Q. No security training?

09:41:58 19 A. I got the training after I joined the GIS.

09:42:01 20 Q. I see. And what kind of training did you get  
09:42:05 21 after you joined the GIS?

09:42:16 22 A. Mostly in information gathering in a proper  
09:42:19 23 manner, all human rights laws and ways to preserve  
09:42:31 24 security within the community.

09:42:35 25 Q. Were you trained in how to interview a person

09:42:37 1 who you were interested in learning more about?

09:42:48 2 A. Correct.

09:42:50 3 Q. And in your work since 1995 through today --  
09:42:57 4 let me back up.

09:43:03 5 All of the questions I ask you, unless I  
09:43:05 6 say differently, I'm referring to the period from 1995  
09:43:12 7 through today. But if something was different during  
09:43:21 8 some period of time within that period, just tell me,  
09:43:29 9 if you would.

09:43:30 10 A. Work outside the GIS?

09:43:37 11 Q. No. I'm going to ask you about your job in  
09:43:41 12 the GIS and how you performed that job and things like  
09:43:47 13 that.

09:43:49 14 So if there's any difference in the answer to  
09:43:54 15 any of those questions, if things changed between 1995  
09:44:02 16 and today with respect to the question I'm asking you,  
09:44:11 17 just tell me, if that's okay.

09:44:17 18 A. Okay.

09:44:20 19 Q. Now, when you learned how to properly  
09:44:24 20 interview a person you were interested in getting  
09:44:28 21 intelligence on, were you taught to record -- make  
09:44:37 22 a recording of the statement?

09:44:49 23 A. I have learned doing interviews in a general  
09:44:53 24 manner, without the technological tools.

09:45:04 25 Q. Have you ever made a recording of an interview



09:45:06 1 of a suspect?

09:45:10 2 A. Not technical, but in writing.

09:45:12 3 Q. Oh. You would take notes from the interview?

09:45:16 4 A. Yes.

09:45:17 5 Q. During the interview?

09:45:25 6 A. Yes. After that, the suspect reads it, and  
09:45:30 7 he signs it.

09:45:31 8 Q. I see. That -- that would be your standard --

09:45:34 9 CHECK INTERPRETER HAZOU: A second. You

09:45:38 10 missed another piece. He will ask him to sign it.

09:45:42 11 If he wants to sign it, he will sign it. If he doesn't,  
09:45:45 12 then he won't sign it.

09:45:48 13 That's what he said.

09:45:49 14 THE WITNESS: If he doesn't like what's noted,  
09:45:52 15 then he doesn't have to sign.

09:45:53 16 Q. BY MR. SCHOEN: And if he tells you to change  
09:45:56 17 something, you might make that change that he says?

09:46:01 18 A. Of course.

09:46:03 19 Q. And what you're describing, that's the general  
09:46:09 20 practice within the GIS, as far as you know?

09:46:19 21 A. According to the best of my knowledge, yes.

09:46:23 22 Q. And after the interview, you would go back to  
09:46:27 23 your office?

09:46:32 24 A. We do the interviews in the office.

09:46:35 25 Q. In the office.

09:46:37 1 After the interview, did you make notes for  
09:46:39 2 yourself?

09:46:41 3 A. Yes.

09:46:41 4 Q. You created a file for this person?

09:46:50 5 A. Yes. After we finish, we make a dossier for  
09:46:54 6 the person and follow up after he leaves -- he leaves  
09:46:59 7 us. And each person has a file within the archives.

09:47:07 8 Q. And you make that file -- your notes in that  
09:47:10 9 file. And the documents you keep in that dossier or  
09:47:15 10 file contain a complete account of all that you have  
09:47:25 11 learned about this person, this suspect?

09:47:34 12 A. Correct.

09:47:35 13 Q. Because one day you might need to refer  
09:47:37 14 to the notes or the documents to remember about this  
09:47:41 15 person?

09:47:48 16 A. Correct.

09:47:49 17 Q. And you might have a supervisor who needs  
09:47:54 18 to look at the file, to see what happened with the  
09:47:58 19 investigation?

09:48:08 20 A. Of course, immediately after the interview,  
09:48:10 21 the supervisor looks into -- into what has been done.

09:48:17 22 Q. I see.

09:48:21 23 A. The final decision is for my immediate  
09:48:24 24 superior.

09:48:25 25 Q. So the supervisor needs to review the file

09:48:30 1 also, to know what happened fully?

09:48:37 2 A. Of course, he has to -- to look into it.

09:48:40 3 Q. And he speaks with you or the investigating  
09:48:43 4 officer to find out about the case?

09:48:54 5 A. It's possible, whether there was something  
09:48:57 6 that was not tackled, or neglected. So he fills up  
09:49:02 7 the gaps.

09:49:03 8 Q. The supervisor fills -- oh, I see.

09:49:06 9 The investigating officer fills in the gaps  
09:49:09 10 for the supervisor?

09:49:12 11 A. Based on the instructions of the superior.

09:49:15 12 Q. Okay. Starting in 1995, were you given a  
09:49:24 13 rank in the GIS?

09:49:34 14 A. From the first day that I joined the -- the  
09:49:37 15 GIS?

09:49:38 16 Q. When did you first get a rank within the GIS?

09:49:47 17 A. After a year and a half from getting started.

09:49:51 18 Q. And what's that rank called?

09:49:55 19 A. Sergeant.

09:49:56 20 OFFICIAL INTERPRETER RABINOVITCH:

09:49:56 21 "Lieutenant."

09:49:56 22 THE WITNESS: (In English.) Lieutenant.

09:49:59 23 OFFICIAL INTERPRETER AGHAZARIAN: Sorry.

09:50:00 24 "Lieutenant."

09:50:01 25 Q. BY MR. SCHOEN: What were your job duties,

09:50:04 1 if you recall, when you first started at the GIS?

09:50:14 2 A. The task that I was assigned to?

09:50:20 3 Q. Yes.

09:50:21 4 A. In sequence?

09:50:23 5 Q. If you could, please. If you remember.

09:50:24 6 A. The first six months, my job was to  
09:50:33 7 gather information. Then I became in charge of  
09:50:41 8 the interrogation department. I was supervising  
09:50:51 9 for the various sectors. I was in charge of all  
09:50:56 10 the information-gathering units.

09:51:00 11 Q. When did that start?

09:51:01 12 I'm sorry.

09:51:02 13 When did you become in charge of all the  
09:51:06 14 investigating units?

09:51:15 15 A. In the mid 2004.

09:51:18 16 Q. Uh-huh. Let's back up a little bit, then.

09:51:24 17 In the time frame, let's say, 1998 to 2002,  
09:51:30 18 what were your job duties at the GIS?

09:51:35 19 (Pending question partially translated.)

09:51:38 20 OFFICIAL INTERPRETER RABINOVITCH: Two  
09:51:38 21 thousand and?

09:51:41 22 MR. SCHOEN: Two. '98 to 2002.

09:51:43 23 (Remainder of pending question translated.)

09:51:44 24 THE WITNESS: I was in charge of  
09:51:45 25 interrogation.

09:51:46 1 Q. BY MR. SCHOEN: In charge of interrogation  
09:51:48 2 in Kalkilya?

09:51:51 3 A. Yes.

09:51:52 4 Q. And there -- were there -- are there other  
09:51:54 5 GIS offices besides in Kalkilya?

09:52:01 6 A. In the office?

09:52:03 7 Q. Are there other GIS offices in other towns?

09:52:11 8 A. No. It's only in the city of Kalkilya, at  
09:52:15 9 one office.

09:52:16 10 MR. SCHOEN: I wasn't -- I'm not being clear  
09:52:19 11 in my question. It's my fault. Tell him what I just  
09:52:23 12 said.

09:52:25 13 OFFICIAL INTERPRETER RABINOVITCH: Yes. Could  
09:52:26 14 you please repeat the question so we can be clear about  
09:52:27 15 that?

09:52:28 16 MR. SCHOEN: Yes, but I want him to hear me  
09:52:31 17 say I'm not being clear about my question so it's my  
09:52:34 18 fault.

09:52:34 19 (Last colloquy translated.)

09:52:34 20 Q. BY MR. SCHOEN: There's one GIS office in  
09:52:36 21 Kalkilya?

09:52:41 22 A. In the governorate of Kalkilya. It is in the  
09:52:45 23 town.

09:52:46 24 Q. Are there other towns that have GIS offices?

09:52:57 25 A. In the governorate?

09:52:59 1 Q. Like Ramallah, is there a GIS office in  
09:53:05 2 Ramallah?

09:53:06 3 A. In every governorate, there is an office.

09:53:11 4 Q. That was my question. Thank you.

09:53:14 5 A. I asked you whether it is within the  
09:53:16 6 governorate or outside the governorate.

09:53:20 7 Q. My fault.

09:53:24 8 In Kalkilya, what is the address of the GIS  
09:53:27 9 office?

09:53:29 10 A. The actual?

09:53:36 11 OFFICIAL INTERPRETER RABINOVITCH: The  
09:53:36 12 address?

09:53:38 13 MR. SCHOEN: Yes.

09:53:39 14 THE WITNESS: It has been moving from a  
09:53:42 15 location to another location. From '95 until 2005,  
09:53:49 16 it was located in a certain area.

09:53:51 17 Q. BY MR. SCHOEN: What's that area?

09:53:57 18 A. The first office was where the Israelis were  
09:54:03 19 located, and the GIS, the Israelis, the same location.

09:54:09 20 Q. Do you know the address, actually?

09:54:10 21 A. It is the main road to Nablus.

09:54:13 22 Q. When you say the Israelis were there also,  
09:54:17 23 you were working with Israeli intelligence together?  
09:54:20 24 GIS and Israeli intelligence were working together in  
09:54:25 25 the office?

09:54:31 1 A. No. The Israelis handed it to the PA and  
09:54:36 2 we -- that's how we got in.

09:54:38 3 Q. Oh.

09:54:39 4 A. In December of '95.

09:54:42 5 Q. So you took over the office that the Israelis  
09:54:45 6 had been using?

09:54:50 7 A. Correct.

09:54:54 8 Q. Is there a name for that building?

09:54:58 9 A. It's the GIS. It has no name.

09:55:03 10 Q. Is it a large building?

09:55:08 11 A. One floor.

09:55:09 12 Q. One floor.

09:55:11 13 How many offices in there, if you remember?

09:55:22 14 A. I don't know exactly. I can't -- but there  
09:55:26 15 is a large number of offices.

09:55:29 16 Q. In that period in that office, 1995 to 2005,  
09:55:39 17 do you recall how many GIS people were working in the  
09:55:42 18 office in Kalkilya?

09:55:53 19 A. From '95 to 2005?

09:55:58 20 Q. I can make it smaller if that's -- if you  
09:56:01 21 don't recall the exact date.

09:56:03 22 Do you recall, between '95 and 2005, how many  
09:56:13 23 people at any given time were working in the office?

09:56:27 24 A. There isn't any specific number. The numbers  
09:56:31 25 vary all the time.

09:56:34 1 Q. Okay. So let's take the period 1998 to 2002,  
09:56:37 2 do you recall about how many GIS employees were assigned  
09:56:47 3 to the Kalkilya office?

09:56:57 4 A. No.

09:56:58 5 Q. More than five?

09:57:02 6 A. Yes. More.

09:57:03 7 Q. More than ten?

09:57:09 8 A. More than ten. But after that number, it's  
09:57:13 9 difficult for me to estimate.

09:57:15 10 Q. You don't want me to just continue mentioning  
09:57:18 11 numbers?

09:57:22 12 A. There are people who are known to me and there  
09:57:25 13 are people who are not.

09:57:27 14 Q. Okay. Tell me the names of everyone you  
09:57:29 15 recall who worked for the GIS in Kalkilya between 1998  
09:57:35 16 and 2002 and tell me what their position was, if you  
09:57:46 17 recall.

09:57:55 18 A. In '98, Abdullah Daoud was the head of the GIS  
09:58:03 19 in Kalkilya. In 1999, it was Ibrahim Khaber. Until the  
09:58:14 20 beginning of 2001, Azzam Zakarneh took over. At the end  
09:58:29 21 of 2004, beginning 2005, Jamal Jabara took over.

09:58:37 22 Q. Do you remember the names of anyone else  
09:58:38 23 working in the office during that period?

09:58:42 24 A. Ibrahim Teetan. Ibrahim Teetan was the  
09:58:55 25 deputy of Jamal Jabara for a while. I remember Rafik



09:59:03 1 Mara'abeh, who currently is retired. Ma'ath Shamasneh,  
09:59:17 2 he also retired. Samer Abu Hanieh is also on pension,  
09:59:29 3 retired. Naim Zumari, he also retired. And I should  
09:59:39 4 retire also. It's coming up. They extended for me  
09:59:44 5 for a while, but I should also retire.

09:59:54 6 Q. Anyone else?

09:59:56 7 A. Mahmoud Malouhk, who is currently working  
10:00:04 8 in Ramallah. Abdel Halim Za'arur, he is also working  
10:00:15 9 in the operations department in Ramallah almost since  
10:00:20 10 the last year and a half. Ziad Quzmar. These are the  
10:00:40 11 names that come to my mind.

10:00:44 12 Q. Thank you.

10:00:44 13 Is -- oh, I knew that one.

10:00:45 14 Is the headquarters of the GIS located in  
10:00:54 15 Ramallah?

10:00:55 16 A. The main headquarters?

10:00:57 17 Q. Yes.

10:00:58 18 A. Yes.

10:01:04 19 Q. I believe you said your job stayed the same  
10:01:07 20 until 2005?

10:01:08 21 (Pending question partially translated.)

10:01:17 22 OFFICIAL INTERPRETER RABINOVITCH: What year?

10:01:20 23 MR. SCHOEN: 2005.

10:01:20 24 (Remainder of pending question translated.)

10:01:25 25 THE WITNESS: I said that I was engaged for

10:01:29 1 six months in information gathering.

10:01:31 2 Q. BY MR. SCHOEN: Okay.

10:01:33 3 A. And then until the end of 2004, I was in  
10:01:36 4 charge of interrogation.

10:01:38 5 Q. Yes.

10:01:39 6 A. And then I became supervisor for the various  
10:01:44 7 sectors and the offices dealing with information  
10:01:47 8 gathering. 2006, I became head of operations. 2008,  
10:01:53 9 I was deputy director and also in the operations  
10:01:57 10 department.

10:01:59 11 Q. Let me just stop one second.

10:02:02 12 When you say "head of operations," you mean  
10:02:05 13 for the Kalkilya office?

10:02:10 14 A. For the governorate or the district of  
10:02:13 15 Kalkilya.

10:02:14 16 Q. Okay. And the position after that, which I  
10:02:16 17 think you described as deputy director, that's a higher  
10:02:25 18 position than head of operations?

10:02:29 19 A. Yes.

10:02:29 20 Q. And it's also deputy director for the  
10:02:32 21 governorate of Kalkilya?

10:02:37 22 A. Yes, for the governorate of Kalkilya.

10:02:42 23 Q. And that position, is it fair to say you  
10:02:49 24 supervised the investigating officers for the Kalkilya  
10:02:51 25 governorate GIS office?

10:03:01 1 A. Is it in the position of deputy head?

10:03:10 2 Q. What is the position of deputy head? What  
10:03:15 3 do you do in that position?

10:03:16 4 A. The deputy fills up all the functions that  
10:03:27 5 the head assigns for him. So in case that the head  
10:03:33 6 is absent, he fills up for him.

10:03:37 7 Q. So if the head is absent, you're in charge  
10:03:41 8 of the entire GIS Kalkilya governorate office; correct?

10:03:50 9 A. Yes.

10:03:51 10 Q. And if the head is present, you're the number  
10:03:54 11 two man for the office?

10:03:59 12 A. Correct.

10:04:02 13 Q. All right. Did you have a position after you  
10:04:04 14 were deputy head?

10:04:14 15 A. Please clarify. I don't get it.

10:04:17 16 Q. After head of operations, you became deputy  
10:04:21 17 head?

10:04:29 18 A. Yes. Correct.

10:04:32 19 Q. After that, have you had any other job, after  
10:04:39 20 you were deputy head?

10:04:51 21 A. Simultaneously, I was deputy head and head of  
10:04:56 22 operations. And after that, there was a decision that  
10:05:01 23 you should carry only one title. So they told me, you  
10:05:10 24 know: You would be better off being deputy director.

10:05:19 25 In May 2011, I was transferred to Ramallah

10:05:25 1 for the central operations as assistant to the central  
10:05:31 2 operations commander. And in June 2012, the director  
10:05:44 3 wanted me back in Kalkilya to work closely with him.

10:05:49 4 Q. The director of the Kalkilya governorate  
10:05:51 5 wanted you to work in Kalkilya again?

10:06:00 6 A. He didn't request me directly. But from the  
10:06:04 7 head of the GIS, he requested that I work closely with  
10:06:08 8 him.

10:06:09 9 Q. What is your position today?

10:06:13 10 A. Deputy director.

10:06:15 11 Q. Of the Kalkilya governorate office of the GIS?

10:06:23 12 A. Correct.

10:06:24 13 Q. I didn't ask you at the beginning: What is  
10:06:28 14 your full name? Just Ibrahim Dahbour?

10:06:29 15 A. Ibrahim Abdullah Hamed Dahbour.

10:06:37 16 Q. Do you have some kind of ID number also?

10:06:43 17 A. 909195547.

10:06:53 18 Q. Is that a number the PA gives or the PLO?

10:07:02 19 A. The number of the ID? No. I carry --  
10:07:09 20 this number has been since the -- you had the Civil  
10:07:14 21 Administration, Israeli. (Indicating.)

10:07:18 22 Q. I see.

10:07:20 23 A. Since I was 15, it's the same number.

10:07:24 24 Q. It's an Israeli number, you're saying?

10:07:26 25 A. It's an Israeli number.

10:07:29 1 Q. I see. Of what -- where are you a citizen?

10:07:36 2 A. Not a single country.

10:07:38 3 Q. I see. Not an Israeli citizen?

10:07:44 4 A. I lived under Israeli rule, but I wasn't a  
10:07:48 5 citizen.

10:07:55 6 Q. I asked you before about the file that you  
10:07:59 7 keep in an investigation.

10:08:07 8 You remember?

10:08:11 9 A. Which file?

10:08:12 10 Q. No, just the general procedures for a file.

10:08:20 11 A. Correct.

10:08:21 12 Q. If an investigation is conducted in Kalkilya,  
10:08:31 13 that file that's created from the investigation, is that  
10:08:37 14 kept in the Kalkilya office of the GIS?

10:08:50 15 A. Let me clarify specifically this point. The  
10:08:56 16 original dossier with the -- with the papers attached  
10:09:01 17 to it is in Kalkilya. But there is a resum [sic] -- but  
10:09:12 18 we send a resum [sic] to the head of the GIS operations.  
10:09:17 19 But the main dossier is in the archives.

10:09:22 20 Q. When you say "resum," does that mean a  
10:09:25 21 summary?

10:09:27 22 A. Yes.

10:09:28 23 Q. Where's the archives kept?

10:09:34 24 A. Within the building of the GIS.

10:09:38 25 Q. In Kalkilya?

10:09:39 1 A. Yes.

10:09:41 2 Q. Do you have access to those archives?

10:09:51 3 A. Ex-officio, yes.

10:09:52 4 MR. SCHOEN: Now you've got me with the  
10:09:56 5 English. What does "ex-officio" mean?

10:09:57 6 OFFICIAL INTERPRETER AGHAZARIAN: "By my  
10:09:59 7 function."

10:09:59 8 OFFICIAL INTERPRETER RABINOVITCH: "Within  
10:10:01 9 the settings of my functions."

10:10:02 10 MR. SCHOEN: Okay. Albert happens to have  
10:10:04 11 a much larger vocabulary than I do in English also,  
10:10:10 12 I'm sorry to say.

10:10:11 13 OFFICIAL INTERPRETER AGHAZARIAN: This is  
10:10:11 14 a Latin word.

10:10:15 15 MR. SCHOEN: Yeah, uh-oh, now you're being  
10:10:15 16 mean, unnecessarily mean. But you're right again.  
10:10:20 17 I don't know if I can turn redder than I am, though,  
10:10:23 18 already.

10:10:24 19 All right. I just want to -- I think I can  
10:10:24 20 move forward here.

10:10:25 21 Q. BY MR. SCHOEN: In preparation for your  
10:10:45 22 testimony today -- in preparation for your testimony  
10:10:54 23 today, did you review certain records in the Kalkilya  
10:10:58 24 GIS office?

10:11:03 25 A. Today?

10:11:04 1 Q. No, in preparing to testify for today.

10:11:14 2 A. I know the dossiers from previously. I have  
10:11:22 3 been exposed to it. I know them.

10:11:25 4 Q. All the dossiers from the Kalkilya office?

10:11:29 5 A. I am familiar with most of the dossiers.

10:11:32 6 Q. You grew up in Kalkilya?

10:11:35 7 A. Yes.

10:11:35 8 Q. You -- you've lived in Kalkilya all your life?

10:11:39 9 A. Yes.

10:11:40 10 Q. And you work in Kalkilya in intelligence?

10:11:45 11 A. Yes.

10:11:46 12 Q. Would it be fair to say you know something  
10:11:49 13 about almost everyone who lives in Kalkilya?

10:11:59 14 A. I know some things, but of course, I don't  
10:12:03 15 know everything on everybody.

10:12:07 16 Q. Sure.

10:12:09 17 When were you told that you would be testifying in this  
10:12:13 18 case?

10:12:23 19 A. On Monday, I was informed that I'm needed  
10:12:27 20 to -- to testify and that there were papers with the  
10:12:32 21 lawyers.

10:12:33 22 Q. I see. So you reviewed papers that the  
10:12:37 23 lawyers had?

10:12:42 24 A. Yes.

10:12:46 25 MR. SCHOEN: Mr. Hibey, I'm going to ask him

10:12:48 1 what the papers were.

10:12:50 2 Q. BY MR. SCHOEN: What papers that the lawyers  
10:12:53 3 had did you review?

10:13:02 4 A. Papers that are related to Sadiq Ahed Abdul  
10:13:04 5 Hafez and Ra'ed Nazzal.

10:13:15 6 Q. Did you review any papers -- other than  
10:13:18 7 the papers the lawyers had, did you review any papers  
10:13:25 8 related to those two people you just mentioned?

10:13:42 9 A. These are the only documents that -- that  
10:13:48 10 I had available.

10:13:49 11 Q. Did you look in the archives in Kalkilya to  
10:13:52 12 see if there were any documents related to either or  
10:13:56 13 both of these two people?

10:14:07 14 A. Correct. I checked the files. And all the  
10:14:12 15 information related to those two people, I have provided  
10:14:16 16 them to the lawyers.

10:14:17 17 Q. I see. So you found their files and provided  
10:14:21 18 them to the lawyers?

10:14:26 19 A. Correct. On Monday.

10:14:29 20 Q. Where did you find the files?

10:14:38 21 A. In the archives.

10:14:41 22 Q. In Kalkilya?

10:14:42 23 A. Yes.

10:14:43 24 Q. Were the files -- as far as you know, were  
10:14:45 25 the files on these two people their complete files?



10:14:59 1 A. The information that was provided, or is it  
10:15:01 2 the information which is within the archives?

10:15:05 3 Q. Oh. Do you believe that the files you took  
10:15:07 4 from the archives and gave to the lawyers are the  
10:15:16 5 complete files that were created by the GIS regarding  
10:15:22 6 those two people?

10:15:27 7 A. Correct.

10:15:30 8 Q. By the way, are files kept there based on the  
10:15:34 9 person's name or a particular event, like some suicide  
10:15:46 10 bombing, or both?

10:15:58 11 A. We keep them by name. That's how we file  
10:16:02 12 them. Even if there are things published in the papers  
10:16:11 13 or other events that occur, we -- we incorporate them  
10:16:16 14 in this file, which is set up by name.

10:16:19 15 Q. The file should reflect every relevant fact  
10:16:23 16 or event that you know about for that person?

10:16:37 17 A. The events that we come to know about.

10:16:42 18 Q. Yes. From whatever source?

10:16:42 19 A. From a source.

10:16:43 20 Q. From any source?

10:16:46 21 A. Regardless of the source.

10:16:48 22 Q. Are there files kept on computer also?

10:16:56 23 A. Correct. We -- we feed -- there are dossiers  
10:17:01 24 that we feed into the computer.

10:17:05 25 Q. Do you know whether any information about

10:17:08 1 these two people you mentioned are also in computer  
10:17:11 2 files?

10:17:15 3 A. No. I have reviewed. All the information  
10:17:19 4 is there.

10:17:21 5 Q. I'm asking: But are there computer files that  
10:17:24 6 exist for these two people?

10:17:34 7 A. What we have in the computer are the resums  
10:17:36 8 [sic], the summaries, of the different dossiers.

10:17:43 9 Q. Including the -- oh, including these two  
10:17:47 10 people?

10:17:48 11 A. Yes.

10:17:48 12 Q. And you reviewed those computer files also?

10:17:56 13 A. Everything related to those two persons.

10:18:00 14 Q. Anywhere that you knew it would be kept,  
10:18:02 15 including in the Ramallah office?

10:18:04 16 Did you check in the Ramallah office, see  
10:18:07 17 if there's information about those two people?

10:18:19 18 A. Ramallah or otherwise, they get their --  
10:18:23 19 they extract their information from the district.

10:18:27 20 Q. So if you reviewed the Kalkilya file, you  
10:18:34 21 should have everything in the file of that person?

10:18:43 22 A. Correct.

10:18:44 23 Q. And anything you found in Ramallah or on the  
10:18:47 24 computer would have already been in the Kalkilya file?

10:18:58 25 A. Correct.

10:18:59 1 Q. Now, if you want to investigate -- I'm sorry.

10:19:06 2 If you want to learn more about a suicide  
10:19:09 3 bombing that happened sometime in the past and that  
10:19:20 4 was investigated sometime in the past -- let me be --  
10:19:29 5 I'll be more specific so I'm not just --

10:19:33 6 If today you wanted to investigate a suicide  
10:19:39 7 bombing in Karnei Shomron in February of 2002 and you  
10:19:51 8 didn't know the names of the bombers or the bombers'  
10:19:56 9 handler or anyone involved, how would you go about  
10:20:05 10 investigating or learning about what happened then,  
10:20:08 11 if you didn't know the name of anyone whose file to  
10:20:14 12 look at?

10:20:25 13 A. Of course, we are living in a time in the  
10:20:31 14 street. And an operation of explosives, what have you,  
10:20:36 15 everyone will know about. The news will spread quickly.  
10:20:43 16 If you ask a little child in the street, he would know.

10:20:47 17 Q. He would know or would have heard who was  
10:20:54 18 involved in the bombing?

10:20:58 19 A. Well, the word passes quickly.

10:21:02 20 Q. Yes.

10:21:07 21 On these two people you mentioned, Ra'ed  
10:21:09 22 Nazzal -- did you know that name before you looked  
10:21:21 23 at the file to prepare to testify here?

10:21:24 24 CHECK INTERPRETER HAZOU: Wait. You said  
10:21:32 25 "the name" or "the names"?

10:21:36 1 MR. SCHOEN: "Name."  
10:21:38 2 Q. BY MR. SCHOEN: Ra'ed Nazzal.  
10:21:40 3 A. Did I know his name or know him personally?  
10:21:47 4 Q. First, did you know the name before?  
10:21:50 5 A. Yes.  
10:21:50 6 Q. Ra'ed Nazzal was from Kalkilya; correct?  
10:21:56 7 A. Yes.  
10:21:56 8 Q. Ra'ed Nazzal was a well-known person in  
10:22:00 9 Kalkilya; correct?  
10:22:01 10 A. Correct.  
10:22:02 11 Q. Ra'ed Nazzal was a leader of the PFLP in  
10:22:09 12 Kalkilya; correct?  
10:22:11 13 A. This was known, of course.  
10:22:15 14 Q. And this person, Hafez, the -- Hafez?  
10:22:22 15 A. Sadiq.  
10:22:24 16 MR. SCHOEN: That's not an English word, so  
10:22:28 17 I don't know what it means.  
10:22:29 18 OFFICIAL INTERPRETER AGHAZARIAN: That's the  
10:22:29 19 name. "Sadiq."  
10:22:29 20 OFFICIAL INTERPRETER RABINOVITCH: That's a  
10:22:29 21 name. It's a name.  
10:22:30 22 OFFICIAL INTERPRETER AGHAZARIAN: You said  
10:22:30 23 Hafez, no?  
10:22:30 24 MR. SCHOEN: Oh. So what should I call him  
10:22:30 25 to identify him?

10:22:30 1 OFFICIAL INTERPRETER AGHAZARIAN: "Sadiq."  
10:22:30 2 MR. SCHOEN: That's his last name or first  
10:22:30 3 name?  
10:22:30 4 OFFICIAL INTERPRETER AGHAZARIAN: First name.  
10:22:30 5 OFFICIAL INTERPRETER RABINOVITCH: Sadiq Hafez  
10:22:30 6 is the name.  
10:22:41 7 THE WITNESS: Sadiq Hafez.  
10:22:43 8 MR. SCHOEN: Okay. If I refer to -- sorry.  
10:22:45 9 If I refer to "Sadiq," we're talking about Hafez.  
10:22:51 10 OFFICIAL INTERPRETER AGHAZARIAN: It means  
10:22:51 11 literally "truthful."  
10:22:54 12 MR. SCHOEN: The name, like -- right -- like  
10:22:54 13 Tzadik or Tzadok, something like that.  
10:22:59 14 OFFICIAL INTERPRETER AGHAZARIAN: The name,  
10:22:59 15 "truthful."  
10:22:55 16 MR. SCHOEN: Or Tzadok, something like that.  
10:22:59 17 Okay.  
10:23:03 18 Q. BY MR. SCHOEN: This person we spoke about  
10:23:08 19 whose file you looked at, Sadiq Hafez, did you know  
10:23:15 20 that name before you were called to testify today?  
10:23:22 21 A. After the operation, I came to know his name.  
10:23:27 22 Before that, he wasn't known to me.  
10:23:30 23 Q. But your office investigated him, this Sadiq  
10:23:34 24 Hafez, before the operation; right?  
10:23:47 25 A. About him, not with him.

10:23:50 1 Q. You investigated about Sadiq Hafez before the  
10:23:55 2 operation?

10:24:05 3 A. He was a student in the Vocational Qalandia  
10:24:08 4 Training Center. And part of the mechanisms of the  
10:24:18 5 modus operandi of the GIS, any student that moves from  
10:24:24 6 a district to another, we gather information regarding  
10:24:27 7 this person.

10:24:29 8 Q. Is that what he did, he moved from one  
10:24:31 9 district to another?

10:24:35 10 A. He moved in order to study in the Qalandia  
10:24:38 11 vocational school.

10:24:43 12 Q. In Kalkilya?

10:24:45 13 A. No. It's in Ramallah.

10:24:47 14 Q. I see. So he moved from Kalkilya to Ramallah  
10:24:50 15 to study in that school?

10:24:51 16 A. In a vocational school. Yes.

10:24:54 17 Q. By the way, when we refer to "the operation,"  
10:24:57 18 we're referring to the suicide bombing in February in  
10:25:01 19 Karnei Shomron of 2002; right?

10:25:04 20 When you asked me -- I'm sorry.

10:25:11 21 To make it clear, you said before the  
10:25:13 22 translated words "before the operation" or "after  
10:25:15 23 the operation." We're referring to the suicide  
10:25:20 24 bombing in Karnei Shomron?

10:25:33 25 A. Yes.

10:25:34 1 MR. SCHOEN: Okay. There's only a minute  
10:25:36 2 or two left on the tape. We'll take a break. I don't  
10:25:40 3 need much of a break. So you tell me what you'd like.

10:25:44 4 Again, estimates have not been reliable, but  
10:25:47 5 I really think that we're going to finish up with him  
10:25:50 6 within an hour, hour and a half, after we come back,  
10:25:53 7 I think. I'm going to talk to my colleague.

10:25:57 8 MR. HIBEY: If you could let me know after  
10:25:59 9 the break whether that estimate holds up --

10:26:03 10 MR. SCHOEN: Yes. Yes.

10:26:03 11 MR. HIBEY: -- and what your intentions are  
10:26:06 12 with respect to Dr. Swailem, then that would be very  
10:26:11 13 helpful, and we can get word back to him in Ramallah.

10:26:15 14 MR. SCHOEN: Yes, sir. Yes, sir.

10:26:16 15 THE VIDEOGRAPHER: Going off the record at  
10:26:18 16 10:27.

10:26:19 17 (Recess from 10:27 a.m. to 10:42 a.m.)

10:41:13 18 THE VIDEOGRAPHER: Going back on the record  
10:41:26 19 at 10:42.

10:41:30 20 MR. SCHOEN: Now, Mr. Hibey, you had asked  
10:41:33 21 me whether I can make any kind of conclusion about  
10:41:37 22 Dr. Swailem. First of all, can you just -- if you know,  
10:41:39 23 can you just tell us who he is, what his job is, what  
10:41:43 24 his --

10:41:44 25 MR. HIBEY: He's an academic.

10:41:47 1 MR. SCHOEN: He's an academic?

10:41:49 2 MR. HIBEY: He is a professor at --

10:41:52 3 MR. O'TOOLE: Al-Quds.

10:41:53 4 MR. HIBEY: Al-Quds.

10:41:55 5 MR. SCHOEN: He's an economist, I think;  
10:41:56 6 right?

10:41:57 7 MR. HIBEY: I think not. I understood him  
10:41:59 8 to be a political scientist. But I don't know if he  
10:42:02 9 has other expertise.

10:42:04 10 MR. SCHOEN: I would tell you now, then, that  
10:42:09 11 you could release Dr. Swailem and that we will not be  
10:42:14 12 examining him.

10:42:16 13 Q. BY MR. SCHOEN: Reminds me, though, I wanted  
10:42:20 14 to ask you, Mr. Dahbour: Are you familiar with another  
10:42:24 15 Ibrahim Dahbour?

10:42:30 16 A. I saw recently on Facebook that there -- that  
10:42:37 17 there are -- there is somebody else, at least one from  
10:42:39 18 Jenin who carries the same name. One of them is a  
10:42:48 19 representative in the PLC for Hamas, the Legislative  
10:42:53 20 Council. He is from Arrabi.

10:42:55 21 Q. And his home was recently raided, and he was  
10:42:58 22 suspected of certain crimes; right?

10:43:06 23 A. I don't know him because he is from Jenin.  
10:43:08 24 But I have seen his name on Facebook.

10:43:12 25 Q. But he is Hamas and you're not Hamas; right?



10:43:18 1 A. No, I am not.

10:43:21 2 Q. He is actually a Hamas representative with  
10:43:24 3 the -- in the PLO; correct?

10:43:27 4 OFFICIAL INTERPRETER RABINOVITCH: In the PNC  
10:43:30 5 [sic], you mean?

10:43:31 6 MR. SCHOEN: Yes. PLC, the Palestine  
10:43:36 7 Legislative Council.

10:43:38 8 THE WITNESS: Yes. In 2006, he was elected  
10:43:41 9 for Hamas.

10:43:42 10 Q. BY MR. SCHOEN: Yeah. And he still is today,  
10:43:44 11 he's still in it.

10:43:46 12 Anyway, not related to you? That's not you?

10:43:50 13 A. It's just a common name.

10:43:53 14 Q. That allows me to remove an entire file that  
10:43:56 15 I had. That'll also help streamline things.

10:44:08 16 To go back to the process of keeping records  
10:44:11 17 on your investigation, that's a regular way in which  
10:44:19 18 you practice your business of intelligence gathering;  
10:44:23 19 correct? You keep records?

10:44:35 20 MR. SCHOEN: These -- I'm sorry. Albert?

10:44:39 21 THE WITNESS: Correct. We do register it  
10:44:41 22 in the dossier.

10:44:42 23 Q. BY MR. SCHOEN: These files, like the Sadiq  
10:44:45 24 Hafez file and the Nazzal file you spoke about?

10:44:55 25 A. Ra'ed Nazzal, yes.

10:44:57 1 Q. And the person who creates that file, that's  
10:45:00 2 that person's job to create such a file; correct?

10:45:08 3 A. No. It's not the same person that gathers  
10:45:11 4 the dossiers.

10:45:13 5 Q. I see. So tell me how the dossier or the file  
10:45:16 6 is gathered and then how it's kept.

10:45:30 7 A. The principal step is to get the information  
10:45:34 8 from the field. And this is not gathered by one  
10:45:38 9 officer. And sometimes they depend on clandestine  
10:45:44 10 people, undercover people, to gather this information.

10:45:52 11 Once this information gets there, we gather  
10:45:55 12 it, and we give it for the analysis department. The  
10:46:04 13 analysis department exposes it to the director, and  
10:46:11 14 he takes the decision what to do with it. Whether the  
10:46:15 15 people will be under scrutiny, or they will be detained,  
10:46:20 16 or they will cross off the file, I mean, he decides  
10:46:25 17 what, what are the next steps.

10:46:28 18 Once it gets into the archives, it gets  
10:46:33 19 a special registration number. When I want to refer  
10:46:38 20 it, say "Ibrahim Dahbour," so it would feature on the  
10:46:44 21 computer. They see what's the number of the given  
10:46:50 22 Ibrahim Dahbour in this case, and they get the archives  
10:46:54 23 based on the registry number.

10:46:57 24 Q. Who physically puts something into the file?

10:47:00 25 Does the agent or officer who did the

10:47:03 1 intelligence gathering put something into the file?

10:47:20 2 MR. SCHOEN: Not the computer. I didn't say  
10:47:23 3 "computer."

10:47:23 4 OFFICIAL INTERPRETER RABINOVITCH: In the  
10:47:25 5 file. You said "in the file."

10:47:28 6 THE WITNESS: The question is not clear.

10:47:31 7 Q. BY MR. SCHOEN: Okay. Sorry.

10:47:31 8 The person who gathers the intelligence --  
10:47:34 9 let's say you're doing an investigation. You gather  
10:47:43 10 information and you make a report, either you took  
10:47:50 11 notes during the investigation or -- I mean, during  
10:47:56 12 the interrogation, as you described it, or any other  
10:48:05 13 notes that you took about this investigation. You  
10:48:12 14 would take those notes and put those notes in the file  
10:48:18 15 created for that person?

10:48:23 16 A. In the paper dossier which is in the archives,  
10:48:31 17 you mean?

10:48:32 18 Q. Yes.

10:48:32 19 A. All the information.

10:48:34 20 Q. Yes. That's how it would -- that's the  
10:48:35 21 regular practice in the General Intelligence Services?

10:48:44 22 A. This is the way we operate since a while.

10:48:51 23 Q. Since 1995?

10:48:54 24 A. There has been a development in how, you know,  
10:48:57 25 we arrange the dossier and to make a proper summary,

10:49:02 1 resum [sic], and to have a memo of analysis of the  
10:49:08 2 situation. But, in general, this is our modus operandi.

10:49:18 3 Q. And the investigating officer, or whoever puts  
10:49:22 4 something in that file -- puts something into the file,  
10:49:29 5 he does so at around the time that he's gathered the  
10:49:35 6 information?

10:49:52 7 A. Clarify, because there are -- there is a  
10:49:55 8 distinction between interrogation, on the one hand,  
10:50:00 9 and the information gathering from the field, on the  
10:50:02 10 other, before the interrogation. These are two separate  
10:50:06 11 areas.

10:50:06 12 Q. All right. When a person gathers information  
10:50:09 13 from the field, he makes notes about the information he  
10:50:15 14 gathered shortly after he got the information, so he  
10:50:21 15 remembers it well?

10:50:29 16 (Comment in Arabic by the witness.)

10:50:29 17 MR. SCHOEN: You have to answer, Albert.

10:50:29 18 OFFICIAL INTERPRETER AGHAZARIAN: "Yes."

10:50:29 19 Q. BY MR. SCHOEN: And around that same time,  
10:50:34 20 that information gets put into the file?

10:50:47 21 A. So the officer gets the information and feeds  
10:50:50 22 it into the dossier? That's what you mean?

10:50:53 23 Q. Yeah. Puts his notes or whatever information  
10:50:57 24 he has into the file.

10:50:59 25 A. No. He brings it to the operations

10:51:01 1 department. That's where they deal -- they analyze  
10:51:05 2 the information before attaching it to the dossier.  
10:51:09 3 And if there is a measure which is taken, a procedure,  
10:51:13 4 then it happens before it is fed into the archive.  
10:51:17 5 The putting -- attaching it to the archive is the  
10:51:23 6 final phase in the operation.

10:51:25 7 Q. Okay. And is that done soon after the  
10:51:29 8 supervisor has reviewed the information and decided  
10:51:33 9 it should be put into the file?

10:51:42 10 A. No. In the -- in the dossier, you have all  
10:51:46 11 the relevant information.

10:51:48 12 Q. Yes. I'm just trying to find out how the  
10:51:52 13 documents get into the file and when.

10:51:59 14 A. After we get the information coming from the  
10:52:03 15 field --

10:52:05 16 Q. Or an interrogation?

10:52:07 17 A. -- or interrogation, it would be presented  
10:52:13 18 to the operations department. They check the type of  
10:52:23 19 this information.

10:52:27 20 For instance, if there is any important  
10:52:30 21 information, it is presented in front of the director.  
10:52:34 22 And then this head, he decides what measures should  
10:52:41 23 be taken as a follow-up. Once they finish all the  
10:52:46 24 procedures, they put it in the archive.

10:52:56 25 It's possible that, after you put the

10:52:59 1 information in the archives, two days later, a new  
10:53:03 2 information might come in.

10:53:06 3 Q. Okay.

10:53:07 4 A. If this information requires a follow-up  
10:53:12 5 procedure, depending on the importance of the person  
10:53:18 6 and the importance of the dossier, once again, you  
10:53:23 7 have -- a new procedure might be taken.

10:53:28 8 But if it is a regular -- you know, a  
10:53:31 9 non-news kind of information that the guy is --  
10:53:36 10 "I saw him walking in the street with so-and-so,"  
10:53:45 11 then we put it in the dossier but without taking  
10:53:49 12 measures.

10:53:50 13 But all information, regardless how important  
10:53:53 14 or less important, they are all included in the dossier.

10:53:59 15 Q. Okay. And the dossier -- you're using  
10:54:00 16 the term "file" or "dossier" sometimes and sometimes  
10:54:03 17 "archives."

10:54:04 18 I'm really concerned about the file. And  
10:54:06 19 the archives, as I understand it, is where the file  
10:54:10 20 is kept. I don't know if it's a question about the  
10:54:28 21 word being used --

10:54:30 22 OFFICIAL INTERPRETER AGHAZARIAN: The dossier  
10:54:30 23 is not the archive. The dossier is the file.

10:54:34 24 MR. SCHOEN: Okay.

10:54:35 25 OFFICIAL INTERPRETER AGHAZARIAN: But it is

10:54:35 1 a nicer word. It's a French word.

10:54:39 2 MR. SCHOEN: Okay. That's it.

10:54:39 3 OFFICIAL INTERPRETER AGHAZARIAN: They go  
10:54:39 4 together.

10:54:42 5 (Brief exchange in Arabic among Official  
10:54:42 6 Interpreter Aghazarian, Official Interpreter  
10:54:42 7 Rabinovitch, and the witness.)

10:54:42 8 Q. BY MR. SCHOEN: My -- what I'm trying to learn  
10:54:44 9 here is how all of the documents from an investigation  
10:54:48 10 get into the file, not the archives now.

10:55:00 11 A. One dossier?

10:55:01 12 Q. The paper file. How --

10:55:04 13 A. According to the best of my knowledge, what  
10:55:09 14 I have under my hands -- there are people who have very  
10:55:16 15 tiny files. There are people who have books, loads of  
10:55:22 16 information. (Indicating.) It depends.

10:55:24 17 Q. Yeah. I'm really just talking -- I'm asking  
10:55:27 18 about a procedure, maybe.

10:55:30 19 Is it the regular procedure of the GIS during  
10:55:40 20 the time period 19 -- the time period 2000 till now  
10:55:50 21 that, if information is learned by a GIS officer about  
10:55:56 22 a person, that person, the GIS officer or the person who  
10:56:10 23 gathered the information or conducted the interrogation,  
10:56:20 24 first takes notes?

10:56:28 25 A. Correct.

10:56:29 1 Q. And then those notes are given to a supervisor  
10:56:35 2 in operations?

10:56:39 3 A. Yes. Correct.

10:56:40 4 Q. And that person in operations decides whether  
10:56:45 5 additional action should be taken in the case or that  
10:56:56 6 no action needs to be taken?

10:57:08 7 A. The head of the operations studies where we  
10:57:12 8 have reached in the case.

10:57:17 9 Let's assume that it's expected to have an  
10:57:22 10 operation. The head of the operations has a report  
10:57:28 11 accordingly. Immediately he goes to the computer  
10:57:35 12 and the archives, and he derives the information, the  
10:57:42 13 relevant papers. He makes a resum [sic], a summary for  
10:57:46 14 the boss. He tells him that this person, we expect that  
10:57:54 15 he will be engaged in a certain operation. According to  
10:57:59 16 the available dossier, we estimate that this is likely.  
10:58:09 17 So he dispatches it to the boss.

10:58:16 18 So the director has the resum [sic], the  
10:58:21 19 summary, on the face of the file. So he knows that  
10:58:29 20 the head of the operations has scrutinized and checked  
10:58:33 21 the file and based his conclusions accordingly.

10:58:39 22 So the director takes the measures based  
10:58:43 23 on the information available in his hands. He might  
10:58:52 24 suffice with the summary appearing in -- on the top  
10:58:56 25 and take immediate measure accordingly. And maybe he



10:59:03 1 might feel that there is something fishy or unclear,  
10:59:06 2 so he goes in and checks the entire file, all the  
10:59:12 3 papers and information available in the -- in the  
10:59:15 4 dossier.

10:59:16 5 Q. Okay. And all of the papers -- notes or  
10:59:23 6 papers of any kind that were generated or created or  
10:59:31 7 reviewed during the course of that process you just  
10:59:36 8 described, all are put in the file for that person?

10:59:47 9 A. Correct.

10:59:48 10 Q. As you say, sometimes it's a small file,  
10:59:51 11 sometimes it's a big file?

10:59:56 12 A. It depends on the level of activity of the  
11:00:00 13 given person.

11:00:01 14 Q. And who puts all of those papers in the file?

11:00:14 15 A. The person that actually, you know, puts it  
11:00:17 16 in the thing or --

11:00:20 17 Q. Yes.

11:00:21 18 A. -- or how the file is built up?

11:00:24 19 Q. First, who actually puts it in the file.

11:00:29 20 A. The person in charge of the archives, after  
11:00:32 21 it comes from the operations department. And this is  
11:00:36 22 the final measure.

11:00:38 23 Q. And that's a regular part of that person's  
11:00:41 24 job in the GIS?

11:00:47 25 A. Yes. This is the job.

11:00:50 1 Q. And that person does that -- at the time the  
11:00:53 2 file becomes complete, that person puts it in the file,  
11:00:58 3 and then the file into the archives?

11:01:08 4 A. He arranges it in finally within the file,  
11:01:11 5 and he gives it a number. And he preserves the number,  
11:01:21 6 the given number on the computer, because if somebody  
11:01:26 7 needs to request it.

11:01:31 8 So say Ibrahim Dahbour, his number is 440,  
11:01:36 9 so -- so he's in the computerized list. Ibrahim Dahbour  
11:01:40 10 appears with the number 440 in this case. So there  
11:01:47 11 is -- there is no name on my file. It's a number. So  
11:01:53 12 I know from the number that this is from the computer,  
11:01:56 13 Ibrahim Dahbour, and I check it out.

11:02:00 14 Q. And that file that has been created and is  
11:02:04 15 now in the archives, that's what you, as an intelligence  
11:02:10 16 officer, would pull to review, to learn about everything  
11:02:12 17 you could learn about that person?

11:02:27 18 A. This file is the main indicator of where we  
11:02:31 19 are heading.

11:02:33 20 Let's assume, to use myself as an example,  
11:02:39 21 they say we want the dossier of Ibrahim Dahbour. His  
11:02:46 22 number is 440, so they get it out from the archives.  
11:02:51 23 And we found that the last information incoming on  
11:02:56 24 Ibrahim Dahbour is in 2010. So here the officers  
11:03:02 25 are requested to update the information. What did

11:03:07 1 he do between 2010 and 2012? Where was he? What  
11:03:13 2 were his activities and movements?

11:03:16 3 So the information is updated.

11:03:18 4 Q. And if you want to learn about Ibrahim  
11:03:20 5 Dahbour in that situation you gave because you were  
11:03:30 6 investigating Ibrahim Dahbour, for starters, you would  
11:03:37 7 rely on what's in that file?

11:03:42 8 A. Correct.

11:03:43 9 Q. Okay. In this matter, the file of  
11:03:47 10 Mr. Hafez --

11:03:50 11 MR. SCHOEN: The first name is Tzadok?

11:03:53 12 OFFICIAL INTERPRETER AGHAZARIAN: Sadiq Hafez.

11:03:58 13 Q. BY MR. SCHOEN: -- Sadiq Hafez, you reviewed  
11:03:59 14 that file and produced some documents from that file  
11:04:02 15 to defense counsel; correct?

11:04:14 16 A. Correct.

11:04:15 17 Q. Do you remember how big that file was, how  
11:04:17 18 many documents were in it?

11:04:26 19 A. I don't remember exactly. But the dossier  
11:04:29 20 is not big.

11:04:31 21 Q. Maybe ten documents in it?

11:04:39 22 A. I do not want to speculate.

11:04:41 23 Q. Good. Thank you.

11:04:43 24 And the file on Mr. Nazzal, is that a small  
11:04:47 25 file, big file, Ra'ed Nazzal?

11:04:51 1 A. Ra'ed's file is much bigger. He has much more  
11:05:00 2 activities.

11:05:01 3 Q. Any idea how big his file is that you found?

11:05:10 4 A. I don't have the number of papers. But it's  
11:05:16 5 a relatively thicker kind of dossier. (Indicating.)

11:05:21 6 MR. SCHOEN: The witness is indicating with  
11:05:23 7 his fingers. What would we agree on as the size of  
11:05:27 8 that? Is that an inch and a half?

11:05:30 9 OFFICIAL INTERPRETER AGHAZARIAN: It's more  
11:05:30 10 than that.

11:05:31 11 MR. SCHOEN: Two inches?

11:05:32 12 OFFICIAL INTERPRETER AGHAZARIAN: Two to three  
11:05:32 13 inches.

11:05:33 14 MR. SCHOEN: You willing to go with that one  
11:05:34 15 as an estimate?

11:05:35 16 MR. HIBEY: No.

11:05:36 17 MR. SCHOEN: No? Okay.

11:05:36 18 Q. BY MR. SCHOEN: How many centimeters thick  
11:05:39 19 would you say the file is?

11:05:42 20 A. I did not measure it.

11:05:44 21 Q. About, if you were to give an estimate?

11:05:58 22 A. Three and a half to four centimeters.

11:05:59 23 Q. Okay.

11:06:01 24 A. More or less.

11:06:03 25 Q. Okay. And you believe you reviewed his entire

11:06:07 1 file with the GIS?

11:06:14 2 A. From paper to paper, yes, correct.

11:06:17 3 Q. Ra'ed Nazzal was the head of the Ali Abu  
11:06:20 4 Mustafa Brigade for the PFLP in Kalkilya; correct?

11:06:36 5 A. This is not a secret.

11:06:38 6 Q. It was well-known?

11:06:45 7 A. He was released from Israeli prisons in  
11:06:49 8 September in 1999. And this was the main -- this is  
11:06:57 9 a well-known information.

11:06:59 10 Q. That he was PFLP and head of Ali Abu Mustafa  
11:07:01 11 Brigade?

11:07:06 12 A. Yes. Correct.

11:07:08 13 Q. And that's one reason his file would be a  
11:07:11 14 bigger file; correct?

11:07:16 15 A. As I told you, it depends from person to  
11:07:19 16 person.

11:07:20 17 Q. But in his case, that's one of the reasons,  
11:07:24 18 because of his PFLP activities, his file was so thick?

11:07:33 19 A. Right.

11:07:34 20 Q. Now, you're aware that the PFLP had an office  
11:07:37 21 in Kalkilya; correct?

11:07:43 22 A. Right.

11:07:43 23 Q. They had an office in Kalkilya in the 1990s  
11:07:47 24 through today; correct?

11:07:51 25 A. Ra'ed Nazzal?

11:07:56 1 Q. The PFLP had an office in Kalkilya?

11:08:00 2 A. Yes.

11:08:00 3 Q. Okay. And Ra'ed Nazzal worked in that PFLP  
11:08:05 4 office in Kalkilya; correct?

11:08:08 5 A. No.

11:08:09 6 Q. Where did Ra'ed Nazzal work? Do you know?

11:08:14 7 A. Ra'ed Nazzal -- after being released from  
11:08:20 8 the Israeli prison, most of the people who had military  
11:08:29 9 activity were absorbed, recruited by the PA, in order  
11:08:35 10 to distance them from armed activity. And Ra'ed Nazzal  
11:08:41 11 was one of the people who were recruited for the  
11:08:48 12 national security organ, apparatus.

11:08:52 13 I have no idea how many years he served in  
11:08:55 14 this capacity. But, currently, according to the best  
11:09:02 15 of my knowledge, he doesn't get any salary or allowances  
11:09:08 16 now.

11:09:09 17 Q. When you say "now," you mean at that time?

11:09:20 18 A. About Ra'ed, I'm not exactly sure. But the  
11:09:27 19 information I have, that he was murdered in 2002 --

11:09:32 20 Q. When you say about Ra'ed you're not sure --

11:09:35 21 A. -- in April.

11:09:36 22 Q. -- you mean you're not sure whether he  
11:09:38 23 was paid money, how much money he was paid by the  
11:09:42 24 government; correct?

11:09:45 25 A. Correct.

11:09:46 1 Q. All right. Was there only one PFLP office  
11:10:02 2 in Kalkilya?

11:10:05 3 A. Yes.

11:10:05 4 Q. Where was it?

11:10:10 5 A. On the main road leading to Jaljoulieh, that  
11:10:15 6 has been since then shut down, this road.

11:10:18 7 Q. The road has been shut down?

11:10:23 8 A. It has been closed. Because they just kept  
11:10:27 9 one crossing point into Israel. At first there was  
11:10:34 10 through Taibeh and Jaljoulieh and Kfar Saba. So when  
11:10:45 11 the Intifada erupted in 2000, they broke the -- these  
11:10:53 12 roads, all of them. They just kept Kafr Kassem --  
11:10:57 13 sorry. They just kept the road that goes through  
11:11:00 14 Kafr Kassem. They call it Tzomet area.

11:11:13 15 Q. But as far as you know from the period, let's  
11:11:15 16 just say 1998 through 2002, there was just one PFLP  
11:11:25 17 office in Kalkilya operating?

11:11:31 18 A. Yes.

11:11:32 19 Q. Okay. And do you know whether the PFLP owned  
11:11:36 20 or operated other buildings in Kalkilya?

11:11:52 21 A. To the best of my knowledge, no.

11:11:56 22 Q. Do you know who was working in the PFLP office  
11:11:59 23 in Kalkilya, let's say between the years 1998 and 2002?

11:12:19 24 A. Margaret and Manala Rai, these are two women.  
11:12:31 25 Margaret Rai and Manala Rai. Shaher, after he was

11:12:33 1 released by the PA, he came to this office. He was  
11:12:42 2 wanted by the Israelis, and he left the office because  
11:12:49 3 he was wanted by the Israelis. Only these two women  
11:12:54 4 stayed.

11:12:55 5 Q. When you say Shaher, you mean Shaher Al-Rai?

11:13:02 6 A. Shaher Rai, yes.

11:13:05 7 Q. You mentioned the name Yusef.

11:13:07 8 That's also Yusef Al-Rai?

11:13:11 9 A. His brother.

11:13:13 10 Q. Yes. That's who you were referring to?

11:13:16 11 A. Yes.

11:13:18 12 Q. Shaher and Yusef Al-Rai also were PFLP; right?

11:13:33 13 A. This is very well-known. Correct.

11:13:35 14 Q. And the two women who worked in the office you  
11:13:39 15 mentioned, they're also PFLP?

11:13:46 16 A. Logically, of course, yes.

11:13:48 17 Q. Do you know who their husbands were?

11:14:00 18 A. One is married to Yusef, and the other  
11:14:04 19 is married to Shaher. But I don't know whether it's  
11:14:08 20 Margaret or Manala, which. But they were both married  
11:14:12 21 to the -- Yusef and Shaher.

11:14:15 22 Q. And do you know that the building that was  
11:14:18 23 used for the PFLP office was owned by a Mr. Zaid?

11:14:22 24 MR. SCHOEN: I didn't say "Yusef." "Mister,"  
11:14:22 25 Mr. Zaid.



11:14:29 1 (Pending question re-translated.)

11:14:30 2 THE WITNESS: Is it in 2002, if I knew this,  
11:14:35 3 or now, currently?

11:14:38 4 Q. BY MR. SCHOEN: I'm asking you now if you  
11:14:38 5 know.

11:14:42 6 A. Now, yes.

11:14:43 7 Q. And did you know that in 2000 and 2002?

11:14:46 8 A. No. In 2002, I didn't.

11:14:48 9 Q. But during those periods, 1998 to 2002, you  
11:14:51 10 knew that these people who we've mentioned, Shaher,  
11:14:56 11 Yusef, the two women, Nazzal, were all PFLP?

11:15:11 12 A. Of course.

11:15:23 13 Q. If you recall, when is it -- around what  
11:15:26 14 year did Shaher and Yusef Al-Rai leave Kalkilya?

11:15:32 15 You mentioned they left Kalkilya. Around  
11:15:34 16 what year did they leave?

11:15:41 17 A. No, I don't recall. Exactly which year,  
11:15:46 18 I don't recall.

11:15:47 19 Q. If you wanted to find out -- strike that.  
11:15:50 20 Strike that.

11:15:51 21 Shaher and Yusef Al-Rai were put in jail  
11:15:57 22 at some point in Jericho; correct?

11:16:03 23 A. In the GIS prison, yes.

11:16:10 24 Q. Jericho, that's the -- Jericho?

11:16:12 25 A. Correct.

11:16:13 1 Q. Do you know how long they were kept in that  
11:16:16 2 prison?

11:16:21 3 A. Not exactly, but I believe almost seven years.

11:16:25 4 Q. And do you know when they were released from  
11:16:28 5 that prison?

11:16:32 6 A. 2001. 2001.

11:16:38 7 Q. How do you know it was 2001?

11:16:42 8 A. From the dossier.

11:16:44 9 Q. There is a dossier for Shaher Al-Rai?

11:16:49 10 A. Yes.

11:16:52 11 Q. And for Yusef Al-Rai?

11:16:53 12 A. Yes.

11:16:57 13 Q. And are those dossiers kept in the Kalkilya  
11:17:01 14 GIS office?

11:17:04 15 A. Yes.

11:17:04 16 Q. Have you reviewed those dossiers?

11:17:07 17 A. Yes.

11:17:08 18 Q. When did you review them?

11:17:16 19 A. Yesterday, Tuesday.

11:17:18 20 Q. I see. You found those files there Tuesday  
11:17:21 21 and --

11:17:25 22 A. I know that they have dossiers, but I have  
11:17:26 23 scrutinized them yesterday.

11:17:27 24 Q. That you found them in the -- in the regular  
11:17:36 25 archives?

11:17:37 1 A. Yes.

11:17:42 2 Q. Would you characterize the file on Shaher  
11:17:45 3 Al-Rai as a large one also?

11:17:52 4 A. Yes.

11:17:53 5 Q. Larger than Nazzal or smaller than Nazzal?

11:17:57 6 A. Thicker than Nazzal. Because there was  
11:18:01 7 interrogation and there was more follow-up, so it's  
11:18:02 8 a bigger file. And there were confessions on him.  
11:18:09 9 And then his family protested, and there was a lot  
11:18:14 10 of headaches. So the file is bigger.

11:18:18 11 Because the person that made a confession  
11:18:22 12 with the Israelis on him, he withdrew his confession.  
11:18:30 13 And after the person that confessed left the Israeli  
11:18:36 14 prison, while they remained -- you know, the man in  
11:18:40 15 Israel was released, but they remained in the PA prison.

11:18:45 16 Q. The two Al-Rais --

11:18:46 17 (Comment in Arabic by the witness.)

11:18:47 18 Q. BY MR. SCHOEN: Sorry. The two Al-Rais  
11:18:47 19 remained in the Jericho prison?

11:18:51 20 A. Yes.

11:18:52 21 Q. Do you know Muhammad Nazzal?

11:19:02 22 A. There are so many Muhammads.

11:19:06 23 Q. In Kalkilya, there are many?

11:19:09 24 A. Muhammad, Ahmed, Mahmoud. That's a very  
11:19:16 25 common name.

11:19:33 1 Q. I hope I can get a more full name so I can  
11:19:39 2 ask you a better question about Muhammad Nazzal. Okay.

11:19:42 3 A. If you tell me what he is working, and so  
11:19:49 4 maybe that will be -- that would help to know which  
11:19:53 5 Muhammad you mean.

11:19:56 6 Q. I'll try to give as much information as I can.

11:20:16 7 I want to ask you if you recognize these  
11:20:20 8 names, and if you do, tell me what you know about these  
11:20:28 9 people.

11:20:29 10 Maher Al-Rai?

11:20:32 11 A. Popular Front.

11:20:40 12 Q. Is Popular Front -- a PFLP person, member?

11:20:45 13 A. Yes.

11:20:46 14 Q. Who lives in Kalkilya?

11:20:48 15 A. Yes.

11:20:49 16 Q. Is there a GIS file on him?

11:20:55 17 A. Yes.

11:20:58 18 Q. Ahmed Al-Rai?

11:20:58 19 A. There are two Ahmeds. Specify which you are  
11:21:05 20 referring to.

11:21:05 21 Q. You --

11:21:05 22 A. If you mean the guy who belongs to the PFLP,  
11:21:15 23 yes. He is married to the sister -- he is married to  
11:21:21 24 the sister of Ra'ed, if that's the one you refer to.

11:21:27 25 Q. She is an in-law to Al-Rai?

11:21:31 1 A. Yes.

11:21:32 2 Q. Is there a file on that person?

11:21:37 3 A. PFLP, yes.

11:21:38 4 Q. The GIS has a file on that person?

11:21:41 5 A. Yes.

11:21:45 6 Q. Nuradin Adnan Sa'id Daoud, also known as

11:21:53 7 Teetan?

11:21:55 8 A. Yes.

11:21:59 9 Q. PFLP?

11:22:00 10 A. Yes. He was imprisoned by the Israelis, you

11:22:06 11 know, of course.

11:22:08 12 Q. He lives in Kalkilya?

11:22:09 13 A. Yes.

11:22:10 14 Q. All of these people I've mentioned live in

11:22:12 15 Kalkilya; correct?

11:22:14 16 A. All of them, yes.

11:22:16 17 Q. Is there a file, GIS file, on Teetan thus far?

11:22:18 18 A. Yes.

11:22:22 19 Q. Large file?

11:22:25 20 A. I don't recall. But everybody engaged in

11:22:28 21 political activity has a file.

11:22:31 22 Q. Muhammad Jabber?

11:22:31 23 OFFICIAL INTERPRETER AGHAZARIAN: "Jabber."

11:22:33 24 OFFICIAL INTERPRETER RABINOVITCH: "Jabber"

11:22:33 25 or "Jaber"?

11:22:33 1 MR. SCHOEN: "Jabber."

11:22:33 2 OFFICIAL INTERPRETER AGHAZARIAN: "Muhammad

11:22:33 3 Jabber."

11:22:33 4 THE WITNESS: I don't know him.

11:22:42 5 Q. BY MR. SCHOEN: Taqsin El-Adel?

11:22:48 6 A. Taqsin El-Adel. "Improving justice," that's

11:22:56 7 what the word means.

11:22:58 8 Q. Oh. Do you know that person?

11:23:01 9 A. He is imprisoned by the Israelis. PFLP.

11:23:03 10 He is incarcerated.

11:23:05 11 Q. Is there a file on him, GIS file?

11:23:08 12 A. Yes.

11:23:09 13 Q. Shaher A'amar?

11:23:09 14 OFFICIAL INTERPRETER AGHAZARIAN: Al-Amar?

11:23:10 15 MR. SCHOEN: A'amar.

11:23:10 16 (Brief exchange in Arabic among Official

11:23:10 17 Interpreter Rabinovitch, Official Interpreter

11:23:10 18 Aghazarian, Check Interpreter Hazou, and

11:23:10 19 Mr. Spitzen.)

11:23:10 20 OFFICIAL INTERPRETER RABINOVITCH: Amer?

11:23:10 21 THE WITNESS: I don't know him.

11:23:26 22 Q. BY MR. SCHOEN: Doesn't ring a bell?

11:23:37 23 A. I don't recall him.

11:23:41 24 Q. Anis Shanti?

11:23:46 25 A. Anis Douri?

11:23:51 1 Q. Shanti.

11:23:54 2 A. Shanti?

11:23:54 3 Anis Douri is known to be PFLP.

11:24:00 4 MR. SCHOEN: "Is known to be"?

11:24:00 5 OFFICIAL INTERPRETER AGHAZARIAN: "A PFLP

11:24:00 6 member."

11:24:00 7 Q. BY MR. SCHOEN: Also in Kalkilya?

11:24:00 8 CHECK INTERPRETER HAZOU: But he said:

11:24:02 9 "Shanti, no."

11:24:05 10 Q. BY MR. SCHOEN: Shanti, no?

11:24:05 11 A. Shanti, no.

11:24:05 12 Q. And is there a GIS file on this Anis Douri,

11:24:11 13 PFLP guy?

11:24:12 14 A. Yes. Douri, not Shanti.

11:24:12 15 Q. Douri, yeah, yeah.

11:24:12 16 And Ahmed Awani? Awani.

11:24:14 17 A. I don't know. I mean, the names don't --

11:24:30 18 Q. (Not translated.) Not a familiar name? At

11:24:33 19 least the way I'm pronouncing it, it's not a familiar

11:24:37 20 name?

11:24:37 21 MR. SCHOEN: You have to translate it.

11:24:37 22 (Pending question translated.)

11:24:37 23 THE WITNESS: (Witness shakes head in the

11:24:37 24 negative.)

11:24:37 25 OFFICIAL INTERPRETER AGHAZARIAN: Sorry.

11:24:44 1 MR. SCHOEN: My -- since I don't read the  
11:24:48 2 language --

11:24:51 3 MR. HALLER: Muhammad Nazzal that we're  
11:24:54 4 referring to, one of them is Muhammad Wasif Abdel  
11:24:55 5 Rahman Nazzal.

11:24:55 6 (Simultaneous colloquy among Official  
11:24:55 7 Interpreter Aghazarian, Official Interpreter  
11:24:55 8 Rabinovitch, Check Interpreter Hazou, and  
11:24:55 9 Mr. Haller.)

11:24:55 10 THE COURT REPORTER: I'm sorry. Are you  
11:24:55 11 speaking for the record? Because I didn't hear what  
11:24:55 12 you said.

11:24:55 13 MR. HIBEY: Would you take some control of  
11:24:55 14 this? Could you take some control of this?

11:24:55 15 MR. SCHOEN: Yes.

11:24:55 16 MR. HIBEY: Because this is --

11:24:55 17 (Simultaneous colloquy among Mr. Haller,  
11:24:55 18 Mr. Leitner, Official Interpreter Rabinovitch,  
11:24:55 19 and Check Interpreter Hazou.)

11:25:26 20 MR. SCHOEN: Stop. Stop, please. Stop. We  
11:25:26 21 can't have other people speaking into the record. She's  
11:25:30 22 trying to keep a record, so only I can speak. But if --  
11:25:31 23 I know the problem is an innocent one because I can't  
11:25:35 24 pronounce the words. I appreciate the help, but we  
11:25:38 25 won't have a clean record if anyone else speaks.



11:25:41 1 So if you want to tell me a name, I'm happy  
11:25:43 2 to transmit that name or any other word. Feel free to  
11:25:47 3 tell me, please. Thank you.

11:25:49 4 Q. BY MR. SCHOEN: This name that you were given  
11:25:58 5 for this Nazzal, Muhammad or Mahmoud Nazzal, the name  
11:26:03 6 that was just given.

11:26:04 7 A. Muhammad Mahmoud Nazzal?

11:26:04 8 Q. Yes.

11:26:08 9 A. He is the owner of the office that he rented  
11:26:11 10 to the PFLP. He owns the office, Muhammad Mahmoud  
11:26:17 11 Nazzal.

11:26:21 12 Q. Or he is in the family of the -- you know that  
11:26:23 13 Mr. Zaid owns the office?

11:26:33 14 A. Yes. Muhammad Mahmoud Zaid.

11:27:03 15 Q. Yes. Okay.

11:27:04 16 Do you recognize this name: Muhammad Wahid  
11:27:06 17 Abdel Rahman Nazzal?

11:27:12 18 A. No. I don't know who it is.

11:27:15 19 Q. Okay.

11:27:16 20 A. No.

11:27:19 21 Q. I'd like to show you some documents.

11:27:24 22 MR. SCHOEN: Mr. Hibey, I'm going to show him  
11:27:28 23 the documents that we were provided on September 10th  
11:27:40 24 by the defense --

25 //

11:27:41 1 (Comment in Arabic by Check Interpreter  
11:27:41 2 Hazou.)  
11:27:41 3 OFFICIAL INTERPRETER RABINOVITCH: "September  
11:27:41 4 10th."  
11:27:57 5 MR. SCHOEN: -- by e-mail. And I represent  
11:28:00 6 to you that, in his e-mail to me, Mr. McAleer wrote  
11:28:05 7 that documents Bates stamped 51 to 54 would be documents  
11:28:16 8 about which Mr. Dahbour would have information and that  
11:28:25 9 could be shown to him during the examination, if you  
11:28:29 10 want.  
11:28:33 11 Without going into detail, I would just  
11:28:38 12 reiterate what I said yesterday. I had not been able --  
11:28:39 13 I don't know what these documents say because I can't  
11:28:39 14 read Arabic. I haven't had a chance to have them review  
11:28:52 15 the documents and tell me in detail. Mr. Haller doesn't  
11:28:56 16 have sufficient -- I understand Mr. Haller does not have  
11:28:57 17 sufficient Arabic background to read them.  
11:29:01 18 MR. HIBEY: That's -- look. Finish your  
11:29:03 19 statement. Thank you.  
11:29:05 20 MR. SCHOEN: I don't really have anything  
11:29:06 21 more to say. I'm just telling you: I don't know what  
11:29:07 22 the documents say when I show them to the witness.  
11:29:07 23 MR. HIBEY: You clearly have the capability  
11:29:12 24 on your side to do that. I myself have heard Mr. Haller  
11:29:17 25 talk about the grammar and syntax of Arabic. He

11:29:20 1 certainly can read it. He understands it. He has  
11:29:24 2 demonstrated that to me on occasion over the five-plus  
11:29:29 3 years we've been engaged in litigation.

11:29:31 4 Obviously, the gentleman next to him, who  
11:29:34 5 is here as a consulting expert, speaks with a dialect  
11:29:38 6 in Arabic that suggests to me that it isn't just picked  
11:29:42 7 up in the first 20 lessons of primary Arabic. I think  
11:29:48 8 we have to be -- we have to be clear about this.

11:29:50 9 With respect to your own facility, I accept  
11:29:54 10 any representation you make about your own abilities  
11:29:58 11 in whatever language is being advanced in the course  
11:30:04 12 of review of documents and things like that. But  
11:30:08 13 please understand that we have a serious disagreement  
11:30:15 14 about your immediate capability to translate the  
11:30:19 15 materials that you did receive.

11:30:22 16 Now, I presume also that there are no  
11:30:26 17 translations that are going to be offered to us in  
11:30:30 18 English of these materials.

11:30:33 19 MR. SCHOEN: The materials that you provided  
11:30:34 20 to us in Arabic?

11:30:37 21 MR. HIBEY: Correct.

11:30:39 22 MR. SCHOEN: Correct.

11:30:39 23 MR. HIBEY: All right. We will object to  
11:30:40 24 the use -- in the absence of a document that's going  
11:30:44 25 to be used in this deposition, because they have to be

11:30:46 1 translated by you for us -- in the use of the materials  
11:30:52 2 in the deposition that you're convening.

11:30:56 3 With that said, I think we can go forward.

11:31:01 4 MR. SCHOEN: Let me be clear. We have no  
11:31:03 5 English translations of the documents that you provided  
11:31:06 6 to us in Arabic. And further, Mr. McAleer represented  
11:31:09 7 to me that you have no English translations --

11:31:15 8 MR. HIBEY: That is correct.

11:31:15 9 MR. SCHOEN: -- of those documents.

11:31:15 10 MR. HIBEY: We got them that quickly, as  
11:31:18 11 it's already been testified to, and turned them over  
11:31:20 12 to you. So we have not had the opportunity to get any  
11:31:24 13 translation. And as you well know, our time has been  
11:31:28 14 occupied by the work that has brought us together this  
11:31:32 15 past week.

11:31:33 16 MR. SCHOEN: In fairness, Mr. Hibey, that's  
11:31:38 17 a two-way street. We also have been occupied. And  
11:31:38 18 if you suggest that we have an opportunity, I would  
11:31:40 19 suggest to you that you have had an opportunity.

11:31:44 20 And, frankly, I know that you have not  
11:31:46 21 misspoken intentionally in any regard, and I'm  
11:31:51 22 not sure what you meant by you'd just received  
11:31:53 23 the documents. But we examined a witness yesterday  
11:31:54 24 who testified that the indication on the document,  
11:31:54 25 as he read it, was that that document had been printed

11:31:54 1 on the 5th of September. Now, we both may agree that  
11:32:00 2 that's also within the recent past.

11:32:02 3 I just want to be clear.

11:32:04 4 MR. HIBEY: Well, no, I understand. But it  
11:32:06 5 presumes something else with respect to our receipt of  
11:32:08 6 that document. And I stand by what I said, and I'm not  
11:32:12 7 going to elaborate any further. Let's proceed.

11:32:15 8 MR. SCHOEN: Yes. We'll leave it that we do  
11:32:17 9 have a serious disagreement on this.

11:32:19 10 MR. HIBEY: We have a serious disagreement, we  
11:32:21 11 have a standing objection, and we have a demand that the  
11:32:25 12 documents that you are using should have been translated  
11:32:27 13 by you. You have -- your side having the capacity to do  
11:32:31 14 that, the capability of doing that, in order to advance  
11:32:34 15 it before the witness and before a court in the United  
11:32:38 16 States.

11:32:38 17 MR. SCHOEN: Mr. Hibey, I think that  
11:32:41 18 assertion shows tremendous chutzpah. You have provided  
11:32:44 19 the documents to us in Arabic when they were provided.  
11:32:48 20 Mr. McAleer suggested, in his e-mail, that those  
11:32:52 21 documents be shown to this witness. And that's what  
11:32:55 22 I'm doing.

11:32:57 23 MR. HIBEY: I'm not -- I'm having trouble  
11:32:58 24 with you showing the document to the witness. I'm  
11:33:00 25 having trouble with you using the document in its --

11:33:02 1 in a deposition where I have to sit here and not know  
11:33:05 2 what the Arabic is or what the English is of the Arabic.

11:33:09 3 MR. SCHOEN: Just as I don't know.

11:33:11 4 MR. HIBEY: Well, this ought to be a very  
11:33:13 5 interesting excursion by both of us. Let's see.

11:33:16 6 You have my objection.

11:33:20 7 MR. SCHOEN: I know you weren't here  
11:33:22 8 yesterday. I said yesterday on the record that I  
11:33:24 9 have a continuing objection to even having to examine  
11:33:27 10 these witnesses with these documents like this. And  
11:33:30 11 that goes for all of the depositions after September  
11:33:34 12 10th.

11:33:36 13 MR. HIBEY: Well, that's noted. I believe  
11:33:36 14 that that's noted yesterday.

11:33:36 15 Q. BY MR. SCHOEN: I'm going to show you,  
11:33:36 16 mister --

11:33:43 17 MR. HIBEY: Excuse me, I hate -- I don't like  
11:33:44 18 to interrupt. I really don't.

11:33:44 19 Are we marking anything?

11:33:45 20 MR. SCHOEN: Yes.

11:33:46 21 MR. HIBEY: I say that so that I can -- so  
11:33:49 22 that we know at least what --

11:33:52 23 MR. SCHOEN: Yes. As I said before,  
11:33:54 24 Mr. McAleer suggested I take Bates stamped documents  
11:33:59 25 51 through 54 and show them to Mr. Dahbour to learn

11:34:03 1 more about the documents. That's what I'm doing now.

11:34:05 2 And we'll mark those as Exhibit A to

11:34:08 3 Mr. Dahbour's deposition. And those are defense

11:34:11 4 Bates stamp numbers 51, 52, 53, and 54.

11:34:18 5 MR. HIBEY: Are all "A"?

11:34:20 6 MR. SCHOEN: Yes, these are all "A." I'm  
11:34:21 7 marking it as one unit. All four pages are Exhibit A.

11:34:52 8 MR. HIBEY: Just give me a moment to keep  
11:34:52 9 track.

11:34:52 10 (I. Dahbour Exhibit A marked.)

11:34:58 11 MR. HIBEY: Now --

11:34:58 12 THE COURT REPORTER: One moment, Counsel.

11:34:58 13 MR. HIBEY: May I ask you one other question?  
11:34:58 14 Do you intend to mark by the letter?

11:34:58 15 This is housekeeping. This -- if you want  
11:34:58 16 to take your hands off, you can do it. This if off  
11:34:58 17 the record.

11:34:58 18 MR. SCHOEN: It goes by letter.

11:35:03 19 MR. HIBEY: By letter? Okay. I didn't know.  
11:35:03 20 This is the first one I've been in with you where you  
11:35:03 21 actually --

11:35:03 22 MR. SCHOEN: Do you prefer number? I'll use  
11:35:03 23 number.

11:35:08 24 MR. HIBEY: No, no. I --

11:35:08 25 MR. SCHOEN: Okay. We'll use letters.

11:35:08 1 MR. HIBEY: What's happening there?

11:35:13 2 MR. SCHOEN: Now, the last question is -- it

11:35:15 3 shows the tape has a very short time on it.

11:35:18 4 MR. HIBEY: Do you want to take the break now?

11:35:19 5 MR. SCHOEN: Take the break now, put a new

11:35:19 6 tape in? Should we just put a new tape in and not

11:35:22 7 break?

11:35:25 8 MR. HIBEY: Well --

11:35:25 9 MR. SCHOEN: We'll break for five minutes.

11:35:26 10 MR. HIBEY: I can -- we can do that. I think

11:35:26 11 he's well enough to proceed, and Amy is anxious so she'd

11:35:31 12 like to go on.

11:35:33 13 MR. SCHOEN: Okay. I hear that people have to

11:35:33 14 go to the bathroom. Five minutes and only five minutes,

11:35:37 15 and we'll come right back.

11:35:40 16 THE VIDEOGRAPHER: Going off the record at

11:35:42 17 11:36.

11:40:23 18 (Recess from 11:36 a.m. to 11:46 a.m.)

11:45:44 19 THE VIDEOGRAPHER: On the record at 11:46.

11:45:46 20 Q. BY MR. SCHOEN: Mr. Dahbour, I want to show

11:45:53 21 you what was marked as Exhibit A, already described as

11:46:00 22 a four-page document, Bates stamped. And by that, I

11:46:06 23 mean this number down here. (Indicating.) It's just

11:46:10 24 a number that the defense put on the paper so they can

11:46:18 25 keep track of documents that they can turn over. They



11:46:21 1 give them each a number called a Bates stamp. So this  
11:46:25 2 is 51 through 54, Exhibit A.

11:46:30 3 I'd ask you to look at that document, all four  
11:46:35 4 pages, and tell me if you recognize that document.

11:46:51 5 A. (Examining.) Yes, I know it.

11:46:53 6 Q. What is that document? Or if the pages are --  
11:46:59 7 reflect different documents, tell me what each page is.

11:47:10 8 A. This document?

11:47:13 9 Q. Page 51.

11:47:19 10 A. Yes. This is a request for a security search  
11:47:27 11 about Sadiq Hafez -- Abdel Hafez -- Sadiq Abdul Hafez.

11:47:28 12 This is a request from the Ramallah GIS, because  
11:47:41 13 this person at the time was studying at the Qalandia  
11:47:44 14 vocational school. And as I told you, any student that  
11:47:54 15 moves from district to district, we have to pursue the  
11:47:59 16 matter.

11:48:02 17 So the GIS of Ramallah are requesting a  
11:48:06 18 security search about his file.

11:48:09 19 Q. Is there a date on that document?

11:48:14 20 A. The 2nd of July, 2001.

11:48:18 21 Q. Okay. And what does that date mean? Is that  
11:48:21 22 when the request would have come to --

11:48:27 23 A. This is the date of the request itself --

11:48:30 24 Q. Have you seen --

11:48:30 25 A. -- the way it has been sent by them.

11:48:33 1 Q. Have you seen that document before?

11:48:36 2 A. Of course.

11:48:39 3 Q. Have you --

11:48:40 4 A. I have it in the file.

11:48:41 5 Q. Okay. So these documents, the four pages in

11:48:44 6 front of you, all came from Hafez's file?

11:48:54 7 A. Sadiq.

11:48:56 8 Q. And that's the file you reviewed?

11:49:01 9 A. Yes.

11:49:05 10 Q. And you removed those documents from the file?

11:49:08 11 A. Yes.

11:49:09 12 Q. Made copies?

11:49:12 13 A. Yes.

11:49:14 14 Q. And provided them to the defense?

11:49:17 15 A. Yes.

11:49:17 16 Q. Did you provide the defense with everything

11:49:21 17 that was in Mr. Hafez's file?

11:49:25 18 A. Yes.

11:49:25 19 Q. You don't remember, though, how many documents

11:49:31 20 that was?

11:49:32 21 A. I don't.

11:49:33 22 Q. Okay. Next sheet, 52.

11:49:47 23 A. Let's tackle 52 and 53 together. Combine

11:49:50 24 them.

11:49:51 25 Q. Good.

11:49:55 1 A. As the work of GIS, this letter was dispatched  
11:49:59 2 from Ramallah. It entered into the section of the  
11:50:05 3 operations. The operations requested a security  
11:50:11 4 search from the field. And so we had these two  
11:50:18 5 search warrants. From the field, these reports came.

11:50:24 6 After we received these from the field, the  
11:50:27 7 head of the operations came. He summarized these two  
11:50:33 8 documents and responded to the Ramallah GIS with this  
11:50:37 9 letter.

11:50:38 10 Q. What number is this, his --

11:50:40 11 A. 54.

11:50:54 12 Q. Number 54 is the supervisor's summary.

11:51:01 13 Let me stop you one second, if I might.

11:51:06 14 Pages 52, 53, and 54, are they in printing  
11:51:14 15 or handwriting?

11:51:18 16 A. I said it clearly. This came from the field  
11:51:23 17 by handwriting.

11:51:25 18 Q. That's 52?

11:51:27 19 A. 52 and 53 is coming from the field. It's in  
11:51:31 20 handwriting.

11:51:33 21 Q. And would the handwritten documents, in the  
11:51:36 22 normal course of things, be typewritten at some point?  
11:51:40 23 Or would the supervisor review them in handwriting?

11:51:48 24 A. He reads it with handwriting.

11:52:15 25 Q. Are these all of the documents that you gave

11:52:18 1 the defense from Sadiq Hafez's file, these four pieces  
11:52:27 2 of paper?

11:52:32 3 A. No. There is more than four.

11:52:34 4 Q. Okay. Do you remember how many pages you gave  
11:52:37 5 the defense?

11:52:39 6 A. I don't remember exactly, but it's more than  
11:52:40 7 four.

11:52:41 8 Q. More than ten?

11:52:43 9 A. I don't know.

11:52:44 10 Q. But, in any event, you gave the defense all  
11:52:47 11 of the documents that were in his file?

11:52:52 12 A. Yes.

11:52:53 13 Q. Okay. I have some other documents to talk  
11:52:56 14 to you about that were given to us. I'll get to those  
11:53:03 15 afterwards.

11:53:07 16 Okay. So can you read to us what's on the --  
11:53:10 17 what the report provides, the handwritten notes?

11:53:14 18 You told us what the first document is.

11:53:24 19 A. It's printed here in the -- it is printed.

11:53:26 20 Q. Right. Can you tell us what it says?

11:53:34 21 A. This document?

11:53:36 22 Q. Yes. 51 you already told us about. So take  
11:53:42 23 52, tell us what that says.

11:53:50 24 A. This is in handwriting, of course. Security  
11:53:57 25 search concerning Sadiq. He has his full name and

11:54:05 1 four items: His social status, he is a celibate,  
11:54:10 2 not married; his education and level, he is a student  
11:54:19 3 in Qalandia Vocational School; currently living in  
11:54:24 4 Kalkilya, Hayeshimadi, at the time.

11:54:30 5 Q. Is there a date on that document?

11:54:37 6 A. 9 July, 2001.

11:54:40 7 Q. And would that reflect the date the report  
11:54:43 8 was made, the handwriting was made on the paper?

11:54:47 9 A. Yes.

11:54:48 10 Q. Please continue.

11:54:54 11 A. Political affinity: Nonexistent.

11:55:04 12 It is mentioned he finished the third  
11:55:07 13 preparatory class in Kalkilya and he headed to the  
11:55:10 14 Qalandia Vocational School to study body -- car  
11:55:20 15 bodywork and painting cars. He works for -- in a  
11:55:30 16 garage, in a car garage, Jaljoulieh Street.

11:55:37 17 There are no ethical violations or records  
11:55:46 18 on him, misbehavior or misdemeanor. And he works --  
11:55:55 19 his father works in Israel proper, and they have a  
11:56:02 20 restaurant on the lower floor of the house.

11:56:07 21 A week before the date when the report has  
11:56:11 22 been prepared, a problem happened with Sadiq at the  
11:56:20 23 institute. And this was one day before he was supposed  
11:56:26 24 to graduate from the institute. He left the institute  
11:56:32 25 and went home. His father protested on this. He

11:56:40 1 brought him back in order to pick up his certificate.

11:56:50 2 This is what is the gist of 52.

11:56:57 3 Q. And 53?

11:57:02 4 A. Also the full name, his nickname is Sadiq

11:57:13 5 Zaid. He's back -- Sadiq Zaid -- and living in

11:57:25 6 Kalkilya. Place of birth, celibate, he is a student,

11:57:34 7 and he studies at the Qalandia Vocational School.

11:57:42 8 He worked also in a car garage on Jaljoulieh Street.

11:57:52 9 His father was a worker within Israel, and he has

11:57:55 10 a restaurant on the lower floor of the house.

11:58:02 11 The same thing: It reiterates that he had

11:58:08 12 trouble in Qalandia, a problem happened in Qalandia.

11:58:14 13 What is printed here, it is a summary of what is in

11:58:20 14 handwriting.

11:58:22 15 Q. Which page now? 54?

11:58:26 16 A. 54.

11:58:26 17 Q. That's a summary by the supervisor?

11:58:31 18 A. They type this and dispatch it to Ramallah.

11:58:36 19 Q. If you would just take a quick look at that

11:58:39 20 and see if that -- if there's anything in there that

11:58:42 21 didn't appear in 52 or 53.

11:58:51 22 A. This has no relation. The people who typed

11:58:57 23 it, they typed it from the handwriting. They typed it

11:59:03 24 from the available handwritten material.

11:59:04 25 Q. 54 looks to you like a fair summary -- an

11:59:08 1 accurate summary of what's in the other documents, 52  
11:59:11 2 and 53?

11:59:16 3 A. 52 and 53.

11:59:18 4 Q. Okay.

11:59:18 5 A. This is the usual modus operandi of the GIS,  
11:59:29 6 that they take the handwritten material from the field  
11:59:35 7 through an official typed letter.

11:59:40 8 Q. So the regular course of business that the  
11:59:45 9 GIS follows with respect to its filing procedures was  
11:59:50 10 followed in this case, as far as you can tell?

12:00:00 11 A. Yes.

12:00:04 12 Q. Let me show you, then -- I represent to you  
12:00:07 13 that the other documents that Mr. McAleer suggested  
12:00:11 14 showing to this witness are Bates stamped 63 through 67.

12:00:17 15 MR. HIBEY: That will be your Exhibit B?

12:00:20 16 MR. SCHOEN: Exhibit B.

12:00:49 17 Mr. Hibey, what I'm going to do is: Your  
12:00:54 18 office, I believe through Mr. O'Toole, was kind enough,  
12:00:57 19 at our request yesterday, to bring in a packet of what  
12:00:59 20 Mr. O'Toole said were the -- correct me if I'm wrong --  
12:01:04 21 the originals of the documents that the defense received  
12:01:06 22 so that -- because they may be a bit more legible. That  
12:01:14 23 was our -- the reason for our request anyway. And I  
12:01:16 24 think, in fact, they are a bit more legible.

12:01:19 25 MR. HIBEY: Okay.

12:01:20 1 MR. SCHOEN: I'd -- I'd like to show  
12:01:21 2 the defendant the original because I think he has  
12:01:22 3 a better -- let me show him -- show him the copies  
12:01:26 4 first because they are Bates stamped.

12:01:29 5 MR. HIBEY: If you need to show the originals,  
12:01:31 6 then show him the originals.

12:01:33 7 MR. SCHOEN: The problem is they're not Bates  
12:01:36 8 stamped. Let me show him the Bates stamped ones, see  
12:01:42 9 if -- I'm going to mark as Exhibit B the Bates stamped  
12:01:46 10 documents 63 through 67 provided by the defense. Those  
12:01:53 11 are their Bates stamp numbers. I'm going to call all  
12:01:59 12 of those pages together Exhibit B to this deposition.

12:02:24 13 (I. Dahbour Exhibit B marked.)

12:02:27 14 Q. BY MR. SCHOEN: Mr. Dahbour, I'm going to show  
12:02:30 15 you this document and ask if you can identify it. And  
12:02:34 16 I'm going to ask you to read through it. But this is  
12:02:42 17 a copy, as I understand it, of what you provided. And  
12:02:47 18 I have here, courtesy of the defense, the original  
12:02:54 19 documents as I understand they received them from you.

12:03:01 20 So if you have trouble reading it, let me  
12:03:04 21 know, and we'll work out a system for you to read the  
12:03:09 22 original, if necessary.

12:03:32 23 A. (Examining.) There is nothing which is  
12:03:34 24 clear here. It's not legible. I am sure that I have  
12:03:44 25 brought these documents, but they are not legible.



12:03:49 1 It's difficult with --

12:03:51 2 Q. Okay. I'm going to show you what we  
12:03:54 3 understand to be the originals. And just to make  
12:03:58 4 sure they're the exact same documents, I'll ask  
12:04:01 5 defense counsel, maybe George, their translator, to  
12:04:05 6 look at them.

12:04:06 7 I don't know what the text says. So if you  
12:04:06 8 could tell if it appears to be the same page that --

12:04:11 9 MR. HIBEY: Indulge me for a moment.

12:04:17 10 MR. SCHOEN: Sure.

12:04:18 11 MR. HIBEY: We'll accept your representation  
12:04:20 12 that these are the same documents.

12:04:22 13 MR. SCHOEN: Yeah. Well, I hope I can  
12:04:26 14 recognize them as the same pages. I'm just looking  
12:04:27 15 at the text and see if the text looks the same.

12:04:28 16 MR. HIBEY: Let's go off the record, because  
12:04:31 17 we're burdening the record.

12:04:33 18 THE VIDEOGRAPHER: Going off the record at  
12:04:34 19 12:05.

12:05:12 20 (Brief discussion held off the record.)

12:05:14 21 THE VIDEOGRAPHER: Back on the record at  
12:05:16 22 12:06.

12:05:19 23 Q. BY MR. SCHOEN: Mr. Dahbour, I'm going to show  
12:05:22 24 you the pages from the original that we believe match  
12:05:24 25 up to these pages. And I'll ask you to look at them

12:05:26 1 and see if it's the same page.

12:05:32 2 This page I'm handing you now -- I guess I'm  
12:05:36 3 going to have to mark them?

12:05:38 4 MR. HIBEY: No. Here's what we'll do. Why  
12:05:40 5 don't you, for purposes of the deposition, put those  
12:05:44 6 together --

12:05:44 7 MR. SCHOEN: Okay. Okay.

12:05:44 8 MR. HIBEY: -- as identical pages. Then  
12:05:47 9 when this deposition's over, we'll make sure the record  
12:05:52 10 reflects where we are.

12:05:54 11 MR. SCHOEN: Fine.

12:05:56 12 Q. BY MR. SCHOEN: So I'm going to hand you a  
12:05:58 13 page now.

12:05:59 14 Does this look to you the same as 63?

12:06:04 15 A. Yes.

12:06:06 16 Q. Okay. So take this and hold it.

12:06:06 17 Now, does this look like number 64?

12:06:11 18 A. Yes.

12:06:16 19 Q. Does this look like number 65?

12:06:19 20 A. Yes. Correct.

12:06:25 21 Q. Does this look like 66?

12:06:30 22 A. Yes.

12:06:36 23 Q. Does this look like 67?

12:06:41 24 A. Yes.

12:06:43 25 Q. Okay. So now you have an original -- what

12:06:50 1 I am calling an original -- I guess that's still a  
12:06:54 2 copy -- but the document provided today by the defense,  
12:06:57 3 which we're calling an original, and a copy with a Bates  
12:07:01 4 stamp number.

12:07:04 5 Look at both copies of that and see if you can  
12:07:07 6 read one better than the other and, if you can, tell me  
12:07:13 7 what the document says.

12:07:37 8 A. This is a charge sheet to Jamal Amin where  
12:07:52 9 he confessed against Shaher Rai. This is the first  
12:08:00 10 confession, of course.

12:08:02 11 Q. Now we're talking about document 62?

12:08:06 12 MR. HIBEY: 63.

12:08:07 13 Q. BY MR. SCHOEN: 63. 63?

12:08:17 14 A. Either printing or what is written here? 63.

12:08:32 15 OFFICIAL INTERPRETER RABINOVITCH: No, he  
12:08:32 16 looked at the --

12:08:32 17 MR. HIBEY: He's confused by the exhibit  
12:08:41 18 stamp, tab.

12:08:43 19 But that's 63, Counsel?

12:08:45 20 MR. SCHOEN: 63, correct.

12:08:47 21 Q. BY MR. SCHOEN: The document you just  
12:08:50 22 described was 63; correct?

12:08:53 23 A. The confession of Jamal Amin.

12:08:57 24 Q. Yes. Do you know where that document came  
12:08:59 25 from?

12:09:03 1 A. This is from the IDF. It's an official charge  
12:09:09 2 sheet from the court, from the IDF.

12:09:14 3 Q. But is this a document you provided to the  
12:09:16 4 defense?

12:09:20 5 A. Yes.

12:09:20 6 Q. And where did you get that document from in  
12:09:22 7 order to give it to the defense?

12:09:31 8 A. From the file.

12:09:33 9 Q. Whose file?

12:09:34 10 A. The file of Shaher Rai.

12:09:40 11 Q. So you took that from the file of Shaher  
12:09:42 12 Al-Rai and provided it to the defense?

12:09:46 13 A. Yes.

12:09:47 14 Q. How did you decide to choose that document  
12:09:49 15 from Shaher Al-Rai's file?

12:09:54 16 A. Because I know all the dossiers, Shaher and  
12:09:57 17 Maher and others.

12:10:00 18 Q. Right. But he had a big file, Shaher Al-Rai;  
12:10:02 19 right?

12:10:06 20 A. Right.

12:10:07 21 Q. So why did you pick this particular document,  
12:10:10 22 number 50 -- 63?

12:10:21 23 A. This is -- in Kalkilya, they had made  
12:10:25 24 an uproar. They accused that the Authority is not  
12:10:32 25 following justice. Because the main accused, which

12:10:39 1 is Jamal, who was incarcerated by the Israelis, and  
12:10:47 2 he is the one who confessed against Shaher, Jamal  
12:10:54 3 went home, was released after 40 days, and Shaher  
12:10:58 4 stayed seven years imprisoned by the PA. This is  
12:11:07 5 why it's a very well-known case to the public.

12:11:12 6 Q. I think my question wasn't understood.

12:11:16 7 My question is: Why did you, Mr. Dahbour,  
12:11:22 8 take that particular document and give it -- select it  
12:11:27 9 off from the rest of the documents in the Shaher Al-Rai  
12:11:30 10 file and give that one to the defense?

12:11:41 11 A. Because this is directly related to the case  
12:11:46 12 that we are talking about.

12:11:48 13 Q. So you went through Shaher Al-Rai's file --  
12:11:58 14 (Comment in Arabic by the witness.)

12:12:01 15 MR. SCHOEN: Answer? He said "yes."

12:12:02 16 (Pending question re-translated.)

12:12:03 17 THE WITNESS: Yes.

12:12:06 18 Q. BY MR. SCHOEN: And you decided what  
12:12:08 19 documents, if any, were relevant to these proceedings?

12:12:20 20 A. Why I took this out from the file of Shaher  
12:12:23 21 Rai?

12:12:23 22 Q. Which is this now, 62, 63, or 64?

12:12:30 23 A. All these documents.

12:12:33 24 Q. Okay.

12:12:34 25 A. Because, in the work of the GIS, in the file

1 of Sadiq Hafez and Ra'ed Nazzal, there are notes that  
2 are -- that there is a charge sheet that concerns this  
3 particular case. And it is written in which dossier  
4 it is existing.

5 Q. Which particular case is he referring to?

6 A. That I'm talking about?

7 Q. Yes.

8 A. The case of Sadiq and Ra'ed Nazzal.

9 Q. So in the records of the GIS, there is a file  
10 that relates to the case of Sadiq Hafez and Shaher --  
11 and Ra'ed Nazzal?

12 A. Of course, there is a file.

13 Q. And when you say "the case," you mean the  
14 suicide bombing in Karnei Shomron?

15 A. Yes.

16 Q. In February 2002?

17 A. Yes.

18 Q. So I asked you earlier if files were  
19 maintained only by the person's name or a number for  
20 that person.

21 But is there also a file on this Karnei  
22 Shomron suicide bombing itself?

23 A. No, no. The information, it is written in  
24 the dossiers of specific individuals. This is why  
25 there is a serial number that -- where the information

12:14:47 1 is in each dossier.

12:14:50 2 Q. So what you did was: You knew that Sadiq  
12:14:53 3 Hafez was involved in that suicide bombing, he was  
12:15:04 4 the bomber; right?

12:15:12 5 A. He didn't blow himself up. He threw a bomb,  
12:15:16 6 and he used weapons. He did not make a suicidal  
12:15:21 7 operation.

12:15:25 8 Q. Where did you get that information from?

12:15:29 9 A. It is in the dossier.

12:15:33 10 Q. You don't believe that Sadiq Hafez was a  
12:15:38 11 suicide bomber?

12:15:45 12 A. I know that he participated in this operation.  
12:15:49 13 I don't know exactly in which form the operation was  
12:15:53 14 conducted. The information I have is that he threw a  
12:16:00 15 bomb and he used arms.

12:16:03 16 Q. Is it possible that he threw a grenade first  
12:16:13 17 and then blew himself up in a suicide bombing?

12:16:21 18 A. I don't know.

12:16:27 19 Q. Okay. So you knew that, in some way, Sadiq  
12:16:30 20 Hafez was involved in this suicide bombing in Karnei  
12:16:36 21 Shomron?

12:16:37 22 A. Before the operation?

12:16:39 23 Q. No. When you're looking now for documents  
12:16:42 24 that are relevant to these proceedings.

12:16:45 25 A. Yes.

12:16:46 1 Q. You looked in Hafez -- Sadiq Hafez's file  
12:16:50 2 because you knew he was involved?

12:16:58 3 A. Yes.

12:16:59 4 Q. And you looked in Ra'ed Nazzal's file because  
12:17:02 5 you knew he was involved in the bombing?

12:17:10 6 A. Correct.

12:17:11 7 Q. Are you aware that Ra'ed Nazzal provided the  
12:17:15 8 bomb to Sadiq Hafez?

12:17:17 9 MR. HIBEY: That assumes a fact not in  
12:17:21 10 evidence. Object. Object to the form of the question.  
12:17:24 11 No foundation.

12:17:26 12 Q. BY MR. SCHOEN: The -- I know you're not  
12:17:30 13 familiar with the rules of these proceedings.

12:17:38 14 When I ask you a question, usually, even  
12:17:45 15 if the lawyer objects, you -- you still answer the  
12:17:49 16 question, unless the lawyer directs you not to answer  
12:17:58 17 the question.

12:18:04 18 Now, in this instance, I don't believe the  
12:18:07 19 lawyer was directing you not to answer the question.  
12:18:09 20 But Mr. Hibey will correct me if I'm wrong.

12:18:22 21 I would like you to answer the question.

12:18:28 22 A. How did he blow himself up?

12:18:32 23 Q. No. You knew that -- you know now that Ra'ed  
12:18:35 24 Nazzal was involved in a bombing incident in Karnei  
12:18:41 25 Shomron; correct?



12:18:50 1 A. The Israelis murdered him in April 2002.  
12:18:56 2 And they announced that the reason for murdering him  
12:19:00 3 is -- and Sadiq -- and this is not secret, that Sadiq  
12:19:09 4 was helping in the operation, was involved. He was  
12:19:15 5 murdered two months after the operation was conducted.

12:19:20 6 Q. So you understand that Ra'ed Nazzal was  
12:19:24 7 involved with Sadiq Hafez in the bombing in Karnei  
12:19:29 8 Shomron; correct?

12:19:30 9 MR. HIBEY: I -- let me object to that  
12:19:32 10 question, too. That's not what the witness said.

12:19:35 11 MR. SCHOEN: I am asking the witness whether  
12:19:37 12 that is his testimony.

12:19:41 13 MR. HIBEY: Well, you used the word "so."

12:19:57 14 Q. BY MR. SCHOEN: You understand that Ra'ed --  
12:19:59 15 oh.

12:20:01 16 You understand that Ra'ed Nazzal was involved  
12:20:03 17 with Sadiq Hafez in the attack in Karnei Shomron that  
12:20:09 18 we're talking about?

12:20:11 19 A. I know from the media.

12:20:13 20 Q. Okay. From whatever source, you're aware  
12:20:15 21 of that?

12:20:19 22 MR. HIBEY: Object to the use of the word  
12:20:20 23 "aware," in light of what he had said.

12:20:24 24 MR. SCHOEN: "Aware"? Did you say -- I'm  
12:20:24 25 sorry. Did you say --

12:20:28 1 MR. HIBEY: No, perhaps I was thinking  
12:20:30 2 that the proper word is "aware" as opposed to "you  
12:20:37 3 understand that." Basically, we're talking about  
12:20:40 4 you're attributing hearsay information as a fact to  
12:20:44 5 this witness.

12:20:46 6 MR. SCHOEN: This witness -- I'm asking this  
12:20:48 7 witness about the methodology he used to pull documents  
12:20:53 8 from files.

12:20:54 9 The witness testified -- in my understanding,  
12:20:58 10 the witness' testimony was that he selected those files  
12:21:01 11 that he thought were relevant to the incident that's  
12:21:04 12 the subject of this lawsuit.

12:21:06 13 MR. HIBEY: Yes.

12:21:10 14 MR. SCHOEN: So for purposes of these  
12:21:12 15 questions, I don't care where the witness came to  
12:21:14 16 that conclusion. I'm just asking him whether he had  
12:21:18 17 in mind that that person in this case, Ra'ed Nazzal,  
12:21:24 18 was involved in the attack that's the subject of the  
12:21:28 19 lawsuit.

12:21:28 20 MR. HIBEY: Now, that's slightly different  
12:21:29 21 than the question that you put to him. Because the  
12:21:32 22 question you put to him was a fact that was presumed  
12:21:36 23 when, in fact, he had told you that he had learned of  
12:21:39 24 or became -- had become aware of these two people being  
12:21:46 25 involved in that operation by reason of the Israelis

12:21:52 1 having said so.

12:21:55 2 Q. BY MR. SCHOEN: You selected Ra'ed Nazzal's  
12:21:58 3 file to go through, to pull documents for this case;  
12:22:02 4 correct?

12:22:09 5 A. Shaher?

12:22:19 6 OFFICIAL INTERPRETER AGHAZARIAN: Sadiq.  
12:22:19 7 Sadiq Hafez.

12:22:19 8 MR. SCHOEN: No, I didn't say that.

12:22:19 9 CHECK INTERPRETER HAZOU: He didn't say that.  
12:22:22 10 He said --

12:22:22 11 MR. SCHOEN: I didn't say that.

12:22:23 12 Q. BY MR. SCHOEN: I said: You selected Ra'ed  
12:22:24 13 Nazzal's file to look through, to go through, for  
12:22:30 14 documents that you believe might be relevant to this  
12:22:35 15 case; correct?

12:22:42 16 A. It's not that I think. It is already there  
12:22:45 17 in the dossier. It's indicated within the file.

12:22:49 18 Q. Okay. The file indicates that Ra'ed Nazzal  
12:22:51 19 is a person whose file would have information or  
12:22:56 20 documents relevant to this case?

12:23:12 21 A. Documents?

12:23:13 22 Q. Documents or information would be in Ra'ed  
12:23:14 23 Nazzal's file that are relevant to this case?

12:23:30 24 A. There are reports, that's the Israeli  
12:23:44 25 allegations, that it was done by Sadiq and Nazzal.

12:23:50 1 CHECK INTERPRETER HAZOU: You said --

12:23:53 2 (Exchange in Arabic among Official Interpreter

12:23:53 3 Aghazarian, Check Interpreter Hazou, and the

12:23:59 4 witness.)

12:24:03 5 THE WITNESS: There are reports within the

12:24:04 6 file that indicate, according to the person writing it,

12:24:14 7 that the Israelis accuse Ra'ed and that he recruited

12:24:26 8 him -- recruited Sadiq.

12:24:29 9 CHECK INTERPRETER HAZOU: This is what he

12:24:30 10 said.

12:24:31 11 Q. BY MR. SCHOEN: Why did you pick -- before

12:24:34 12 you looked at the file, Ra'ed Nazzal's file, why did

12:24:38 13 you pick Ra'ed Nazzal's file to look at for purposes

12:24:43 14 of this case?

12:24:48 15 A. This is very clear. According to what is

12:24:54 16 within the file of Sadiq, it is -- it is mentioned

12:25:00 17 that the Israelis accuse Ra'ed. This is why that was

12:25:05 18 my choice of the file to see.

12:25:08 19 Q. Okay. So, first, you looked at Hafez's file?

12:25:13 20 OFFICIAL INTERPRETER AGHAZARIAN: Sadiq.

12:25:13 21 MR. SCHOEN: Sadiq.

12:25:14 22 Q. BY MR. SCHOEN: And you saw reference to Ra'ed

12:25:16 23 Nazzal. And then you looked then at Ra'ed Nazzal's file

12:25:23 24 because of the reference?

12:25:29 25 A. Right.

12:25:31 1 Q. If you know, did the GIS at any time  
12:25:38 2 investigate whether Ra'ed Nazzal was involved in the  
12:25:43 3 attack in Karnei Shomron?

12:25:50 4 A. Let me clarify two matters from this issue.  
12:25:55 5 First of all, this period in 2002, there was  
12:26:01 6 repeated incursions by the Israeli army. Actually, the  
12:26:07 7 offices were not functioning at all in a proper form.  
12:26:13 8 And the -- the area was cut off into A, B, C, et cetera.

12:26:18 9 CHECK INTERPRETER HAZOU: "And it was hard to  
12:26:21 10 get access to Israel."

12:26:24 11 OFFICIAL INTERPRETER AGHAZARIAN: "It was very  
12:26:27 12 difficult to have access."

12:26:29 13 THE WITNESS: We could not have access to  
12:26:32 14 the offices and our work places. There was repeated  
12:26:40 15 incursions, and there was no way to function normally.

12:26:51 16 Between the -- when the operation was  
12:26:54 17 conducted and the murder of Ra'ed Nazzal, there  
12:26:58 18 was merely two months of time. There wasn't time  
12:27:05 19 to conduct a proper investigation and follow-up. And  
12:27:18 20 the main factor is that the offices were paralyzed.

12:27:28 21 Q. BY MR. SCHOEN: I'm asking you whether, at  
12:27:30 22 any time, the GIS investigated who was involved in the  
12:27:35 23 attack in Karnei Shomron?

12:27:38 24 From the time of the attack until today,  
12:27:41 25 has there ever been an investigation by the GIS about

12:27:50 1 any details regarding that attack, including who was  
12:27:55 2 involved or who might have been involved?

12:28:04 3 A. I personally -- I wasn't involved in it. But  
12:28:11 4 I know that there are coordinating committees between  
12:28:15 5 the Israelis and Palestinians that pursue such matters.

12:28:21 6 Q. In your review of Hafez's file, Ra'ed Nazzal's  
12:28:27 7 file, do you see any indication as to whether the GIS  
12:28:31 8 ever performed an investigation into the attack on  
12:28:36 9 Karnei Shomron?

12:28:47 10 A. This investigation happens at the higher  
12:28:50 11 levels of committees, not at our level.

12:28:54 12 Q. So if there were an investigation -- well,  
12:28:57 13 do you know if there was any investigation of the  
12:29:01 14 attack on Karnei Shomron by the GIS at any level?

12:29:08 15 A. I don't know at -- at what level. I do  
12:29:16 16 not want to speculate. According to my information --  
12:29:22 17 I don't know.

12:29:23 18 Q. And what are the higher levels that you're  
12:29:26 19 referring to?

12:29:33 20 A. There are coordinating committees,  
12:29:36 21 Israeli/Palestinian, that specialize in such issues.  
12:29:43 22 They have joint sessions and meetings. You can find  
12:29:48 23 the information about this at that level.

12:29:51 24 Q. Where would that information be kept? Where  
12:29:54 25 would a file about that information be kept?

12:29:58 1 A. I don't know.

12:29:59 2 Q. When you say "coordination," you mean between  
12:30:02 3 the Israeli authorities and the Palestinian authorities  
12:30:04 4 at that higher level?

12:30:13 5 A. Right.

12:30:14 6 Q. Let's talk about the rest of the documents  
12:30:16 7 you have in front of you. We covered so far 63.

12:30:26 8 And what about 64?

12:30:51 9 A. Here on 63 -- sorry -- 64, Jamal Al-Hindi,  
12:31:03 10 that we referred to earlier, who confessed against  
12:31:08 11 Shaher, and he withdrew his confession.

12:31:16 12 He said that: I have been lying in the  
12:31:19 13 confession that I have given.

12:31:25 14 Q. What's the date on that?

12:31:29 15 A. I don't know. This is from an Israeli court.  
12:31:32 16 It's not legible.

12:31:33 17 Q. It appears to be from an Israeli court?

12:31:37 18 A. Yes.

12:31:40 19 Q. Now, this is a document also that you selected  
12:31:44 20 from a file?

12:31:45 21 A. Yes.

12:31:46 22 Q. And whose file did this come from?

12:31:48 23 A. Shaher's file.

12:31:57 24 Q. What made you look at Shaher Al-Rai's file?  
12:32:02 25 What made you select Shaher Al-Rai's file to look at?

12:32:09 1 A. I already clarified why I chose him.

12:32:13 2 Q. Well, you told me -- correct me if I'm wrong.

12:32:16 3 But you told me that you looked first at Sadiq  
12:32:21 4 Hafez's file and you saw a reference to Ra'ed Nazzal;  
12:32:25 5 correct?

12:32:32 6 A. Yes.

12:32:34 7 Q. And that's why you looked at Ra'ed Nazzal's  
12:32:36 8 file?

12:32:40 9 A. Yes. Right.

12:32:42 10 Q. Why did you look at Shaher Al-Rai's file?  
12:32:43 11 Same reason or a different reason?

12:32:43 12 A. I clarified the reason before, earlier. There  
12:32:56 13 was a big uproar in the community on this topic. They  
12:33:05 14 say that the main person who confessed was released.

12:33:09 15 Q. But you're -- you were looking for documents.  
12:33:12 16 You were selecting files to find documents relevant to  
12:33:20 17 this case, the bombing in Karnei Shomron case; right?

12:33:24 18 A. Right.

12:33:31 19 Q. And you picked Ra'ed Nazzal's file because,  
12:33:32 20 in Sadiq Hafez's file, there was a reference to Ra'ed  
12:33:32 21 Nazzal in connection with the Karnei Shomron --

12:33:32 22 (Court reporter clarification.)

12:33:40 23 Q. BY MR. SCHOEN: You looked in Sadiq Hafez's  
12:33:42 24 file because you were looking for documents about the  
12:33:46 25 Karnei Shomron attack?



12:33:47 1 (Comment in Arabic by the witness.)

12:33:47 2 MR. SCHOEN: Albert? He just answered.

12:33:53 3 OFFICIAL INTERPRETER AGHAZARIAN: "Yes."

12:33:54 4 Q. BY MR. SCHOEN: And you then looked in Ra'ed

12:33:57 5 Nazzal's file because you believed there would be

12:34:03 6 something relevant in Nazzal's file about the Karnei

12:34:12 7 Shomron attack; right?

12:34:16 8 A. Yes.

12:34:19 9 Q. When you looked in -- in Hafez's file, Sadiq

12:34:22 10 Hafez's file, did you see a reference to Shaher Al-Rai

12:34:26 11 related to the attack in Karnei Shomron?

12:34:37 12 A. No.

12:34:39 13 Q. So you didn't look in Shaher Al-Rai's file

12:34:43 14 because you believed he was involved in the Karnei

12:34:46 15 Shomron attack; correct?

12:34:54 16 That wasn't the reason you looked in Shaher

12:34:56 17 Al-Rai's file?

12:35:07 18 A. A reason for reading -- going into the

12:35:09 19 Shaher Rai file was the uproar that was raised in

12:35:15 20 the community.

12:35:16 21 Q. Was that uproar -- does that uproar have

12:35:19 22 anything to do with the attack in Karnei Shomron?

12:35:31 23 A. No. But the -- the accusations leveled by

12:35:37 24 Jamal Hindi to Shaher Rai --

12:35:41 25 Q. To or about? About --

12:35:42 1 A. These are two different issues.

12:35:47 2 MR. SCHOEN: No, you've mistranslated the  
12:35:51 3 word, I think, or he's mis-said it. He didn't mean  
12:35:55 4 "to" Shaher Rai. He meant "about" Shaher Al-Rai.

12:35:58 5 CHECK INTERPRETER HAZOU: Yes, "about."

12:35:59 6 THE WITNESS: About.

12:36:00 7 MR. SCHOEN: And I'm sorry. I don't mean  
12:36:02 8 to say you mistranslated anything. Just a slip of the  
12:36:06 9 tongue. Okay.

12:36:07 10 THE WITNESS: The issue of Shaher Al-Rai is  
12:36:16 11 something, and the issue of Sadiq is a different matter  
12:36:20 12 altogether.

12:36:23 13 Sadiq's issue is Karnei Shomron. Now the  
12:36:29 14 Israelis accuse Ra'ed Nazzal of perpetrating or of  
12:36:37 15 recruiting Sadiq.

12:36:40 16 The issue of Shaher, it's the issue related  
12:36:46 17 to the Wadi Al-Qelt incident, the confession of Jamal  
12:36:53 18 Hindi about Shaher in Wadi al-Qelt, on the way to  
12:37:04 19 Jericho.

12:37:05 20 The GIS detained Shaher. Shaher was  
12:37:15 21 incarcerated by the GIC -- GIS. And Jamal Hinde,  
12:37:21 22 in the meanwhile, was detained by the Israelis. Of  
12:37:30 23 course, Jamal, that had confessed about Shaher, went  
12:37:38 24 home. After 40 days he was released. And Shaher  
12:37:41 25 stayed seven years in prison with the PA. This is

12:37:49 1 why there was an uproar on this particular case.

12:37:54 2 Q. BY MR. SCHOEN: About this Shaher and Al-Hindi  
12:37:56 3 business.

12:37:59 4 A. Yes.

12:37:59 5 Q. Okay. Then I'll go back.

12:38:03 6 I asked you how you selected documents from  
12:38:06 7 files to produce to the defense, how you selected whose  
12:38:15 8 file to look in. I thought you told me that you were  
12:38:25 9 looking for documents relevant to the attack in Karnei  
12:38:30 10 Shomron.

12:38:34 11 A. Right.

12:38:36 12 Q. These documents that you're referring to now  
12:38:39 13 about Shaher and Al-Hindi have nothing to do with the  
12:38:43 14 attack in Karnei Shomron; right?

12:38:50 15 A. These documents I brought -- Shaher Al-Rai  
12:38:59 16 is the one who rented the house of Muhammad Zaid. He  
12:39:10 17 signed on the contract to rent the headquarters of the  
12:39:15 18 PFLP. I said anything related to this matter, I will  
12:39:21 19 probe into it. And I was searching whether the PFLP  
12:39:30 20 is directly involved in making this operation.

12:39:38 21 These are very normal kinds of information.  
12:39:41 22 It has nothing to do with the operation itself. And  
12:39:47 23 this is public, I mean, open from the court.

12:39:50 24 Q. But from this large Shaher Al-Rai file, you  
12:39:57 25 selected only these documents as the --

12:40:03 1 A. What was raising furor and uproar, which was  
12:40:06 2 accusing the PA for being unfair and unjust.

12:40:20 3 Q. Again, how is that relevant to the attack in  
12:40:25 4 Karnei Shomron, in your mind?

12:40:30 5 The fact that there was an uproar over Shaher  
12:40:34 6 Al-Rai being locked up in Jericho, you believe -- and  
12:40:41 7 the Al-Hindi confession or false confession, how in your  
12:40:50 8 mind is that relevant to the attack in Karnei Shomron?

12:41:02 9 A. We have -- we have tried to seek if there is  
12:41:05 10 a connection. We found that there is no connection.

12:41:09 11 Q. No connection between what?

12:41:17 12 A. Between Wadi Al-Qelt and the Karnei Shomron.  
12:41:23 13 There is no linkage between these two operations.

12:41:29 14 Q. So you selected these documents because  
12:41:31 15 there's no relevance to the attack in Karnei Shomron?

12:41:36 16 A. We were trying to find a linkage. We found  
12:41:42 17 that there is no such thing.

12:41:44 18 Q. Well, are there documents in Shaher Al-Rai's  
12:41:46 19 file that show that he was a PFLP member at the time  
12:41:53 20 of the attack?

12:41:56 21 A. Yes, he was.

12:41:58 22 Q. Did you select -- are there documents in the  
12:42:01 23 file that show that?

12:42:08 24 A. Reports rather than documents.

12:42:10 25 Q. There are reports in Shaher Al-Rai's file that

12:42:14 1 show that at the time he was a PFLP member; right?

12:42:19 2 A. Right. Even more important, he was detained  
12:42:26 3 by the Israelis from 2005 until 2010. And the charge  
12:42:34 4 sheet clearly indicates that he is a member of the PFLP.

12:42:43 5 Q. And were there documents in Shaher Al-Rai's  
12:42:48 6 file that show that Shaher Al-Rai, on behalf of the  
12:42:58 7 PFLP, rented the -- signed the contract for the Zaid  
12:43:06 8 house that was used as the PFLP office in Kalkilya?

12:43:21 9 A. In Kalkilya? There are reports. I don't have  
12:43:27 10 corroborated evidence.

12:43:28 11 Q. Is there -- in the file of Shaher Al-Rai,  
12:43:32 12 there are reports that Shaher Al-Rai was a member of  
12:43:39 13 the PFLP; correct?

12:43:42 14 A. Right.

12:43:43 15 Q. Did you select any of those documents to give  
12:43:46 16 to the defense lawyers?

12:43:55 17 A. If it was requested from me and it would  
12:44:00 18 have been on the charge sheet that the Israelis have  
12:44:05 19 prepared, if it was requested from me.

12:44:08 20 Q. I'm only asking you whether, when you went  
12:44:11 21 through the file to look for documents for the defense  
12:44:24 22 in connection with these proceedings, when you saw  
12:44:32 23 documents or reports in Shaher Al-Rai's file indicating  
12:44:40 24 to you that Shaher Al-Rai was a member of the PFLP,  
12:44:50 25 did you select any of those documents to show to the

12:44:55 1 defense?

12:45:00 2 A. I did not attach importance on this issue.  
12:45:06 3 Because the Israelis have detained Shaher after the  
12:45:14 4 operation by three years. They held him also on the  
12:45:19 5 charges of being a member of the PFLP, and nothing  
12:45:26 6 else was queried about. The fact that he was already  
12:45:32 7 detained with the Israelis and they are investigating  
12:45:37 8 it, so it was outside my realm of interest.

12:45:42 9 Q. Do you know where Shaher Al-Rai is today?

12:45:47 10 A. In Kalkilya.

12:45:47 11 Q. He lives in Kalkilya today?

12:45:50 12 A. Yes.

12:45:51 13 Q. He is a PFLP member; correct?

12:46:00 14 A. He has been released by the Israelis, cleared.

12:46:05 15 Q. No, I understand.

12:46:05 16 I'm just asking: You know he is a PFLP  
12:46:09 17 member?

12:46:10 18 A. Yes.

12:46:12 19 Q. And is there still the PFLP office in  
12:46:15 20 Kalkilya?

12:46:19 21 A. Yes. They do have an office.

12:46:21 22 Q. Okay.

12:46:23 23 A. But it deals with social activities.

12:46:27 24 Q. How do you know that?

12:46:31 25 A. From the reports that I have in my files.

12:46:35 1 Q. Have you visit --

12:46:36 2 THE VIDEOGRAPHER: I need to change the tape.

12:46:38 3 MR. SCHOEN: Do I have a minute or not?

12:46:36 4 THE VIDEOGRAPHER: Thirty seconds.

12:46:42 5 Q. BY MR. SCHOEN: Are you aware that weapons

12:46:45 6 have been found in the PFLP office in Kalkilya at some

12:46:51 7 time?

12:46:53 8 MR. HIBEY: I'll object to that question.

12:46:54 9 Form. Totally vague. Totally vague. Totally without

12:46:56 10 foundation on this record.

12:46:56 11 Q. BY MR. SCHOEN: Can I get an answer, please?

12:46:59 12 A. Repeat the question, please.

12:47:03 13 Q. Are you aware that weapons have been found

12:47:06 14 in the Kalkilya office of the PFLP?

12:47:10 15 MR. HIBEY: Same objection.

12:47:16 16 THE WITNESS: From behalf of whom?

12:47:18 17 Q. BY MR. SCHOEN: Weapons. On behalf of anyone,

12:47:21 18 weapons have been found in that office?

12:47:24 19 A. I am surprised from such a question.

12:47:32 20 THE VIDEOGRAPHER: We have to go off the

12:47:34 21 record now.

12:47:35 22 THE WITNESS: Because the office was searched

12:47:36 23 by the Israelis at least ten times.

12:47:42 24 THE VIDEOGRAPHER: Going off --

12:47:43 25 THE WITNESS: At least.

12:47:45 1 THE VIDEOGRAPHER: Going off the record at  
12:47:46 2 12:48.

12:47:48 3 (Recess from 12:48 p.m. to 12:59 p.m.)

12:59:08 4 THE VIDEOGRAPHER: Back on the record at  
12:59:11 5 12:59.

12:59:16 6 Q. BY MR. SCHOEN: Mr. Dahbour, when we finished  
12:59:20 7 the last session, I asked whether you were aware that  
12:59:25 8 weapons had been kept in the PFLP house in Kalkilya.  
12:59:28 9 And your answer, as I understand it, was that you would  
12:59:35 10 be surprised to hear that, because the Israelis had  
12:59:44 11 raided the office ten times.

12:59:51 12 Is that a fair characterization of your  
12:59:53 13 testimony?

12:59:59 14 A. Yes.

13:00:00 15 Q. Are you aware, sir, that the Israelis found  
13:00:03 16 weapons in that house, PFLP house in Kalkilya?

13:00:09 17 A. I don't know.

13:00:10 18 Q. Have you ever reviewed the reports from the  
13:00:13 19 Israeli raids of that house, the PFLP house in Kalkilya?

13:00:24 20 MR. HIBEY: Object to that question because  
13:00:27 21 it presumes facts that haven't been established, most  
13:00:30 22 notably that Israeli reports have been given to him.

13:00:53 23 Q. BY MR. SCHOEN: Are you aware that there are  
13:00:55 24 reports of investigation by the Israelis that reflect  
13:01:05 25 having -- the Israelis found -- that the Israelis found



13:01:10 1 weapons in the PFLP house in Kalkilya?

13:01:17 2 A. No.

13:01:18 3 Q. Do you have any estimate as to how many PFLP  
13:01:22 4 members live in Kalkilya?

13:01:28 5 A. Currently?

13:01:44 6 Q. Yes.

13:01:44 7 A. No.

13:01:45 8 Q. How about in the period 1998 to 2002, do  
13:01:48 9 you have any idea about -- any estimate how many PFLP  
13:01:54 10 members lived in Kalkilya?

13:01:57 11 A. I don't have numbers.

13:01:59 12 Q. Any estimate?

13:02:04 13 A. But their number is not significant.

13:02:08 14 Q. Ten?

13:02:08 15 A. I don't know.

13:02:11 16 Q. You knew that the PFLP maintained an office  
13:02:14 17 in Kalkilya during that period, '98 to 2002?

13:02:27 18 A. Yes. That's open.

13:02:30 19 MR. SCHOEN: "That's open" means it's well  
13:02:32 20 known?

13:02:34 21 OFFICIAL INTERPRETER AGHAZARIAN: "Well  
13:02:34 22 known."

13:02:35 23 Q. BY MR. SCHOEN: And even before that period  
13:02:37 24 and after that period until today?

13:02:53 25 A. It has been shut down around 2008.

13:02:57 1 Q. So today there is no PFLP office operating  
13:03:01 2 in Kalkilya?

13:03:08 3 A. It was closed until 2008. After 2008, it  
13:03:12 4 was re-opened.

13:03:14 5 Q. When was it closed?

13:03:18 6 A. 2002. At the end of 2002.

13:03:24 7 Q. Why was the PFLP office in Kalkilya closed  
13:03:28 8 between the end of 2002 and 2008?

13:03:41 9 A. There have been repeated Israeli incursions.  
13:03:44 10 I believe that this is the reason.

13:03:46 11 Q. Who closed down that office?

13:03:49 12 A. No one was working in it, and they shut it  
13:03:55 13 down. There were Israeli incursions, and there was  
13:04:02 14 no funding. So they shut it down.

13:04:17 15 Q. How do you know there was no funding?

13:04:20 16 A. From classified information that we get  
13:04:24 17 together.

13:04:25 18 Q. Where was that classified information stored?

13:04:26 19 CHECK INTERPRETER HAZOU: No, no. "Classified  
13:04:29 20 sources."

13:04:31 21 OFFICIAL INTERPRETER AGHAZARIAN: "Sources."

13:04:32 22 Q. BY MR. SCHOEN: What do you mean by  
13:04:34 23 "classified sources"?

13:04:37 24 A. Intelligence, secret kind of sources.

13:04:41 25 Q. Meaning people who are informants?

13:04:46 1 A. Yes.

13:04:48 2 Q. Who are your sources of information about  
13:04:50 3 the PFLP?

13:04:57 4 A. The persons?

13:04:57 5 Q. Yes.

13:04:58 6 A. The sources?

13:05:01 7 Q. Yes.

13:05:02 8 A. Yes, this is secret material. Classified.

13:05:08 9 Q. I ask you respectfully: Do you refuse to  
13:05:11 10 answer that question?

13:05:15 11 A. No. These are sources within the PFLP.  
13:05:18 12 I cannot reveal them.

13:05:21 13 Q. Okay. And I'm just asking you: Do you refuse  
13:05:24 14 to reveal their identities?

13:05:29 15 A. The names of secret sources, classified?

13:05:35 16 Q. Yes.

13:05:35 17 A. Of course. Of course.

13:05:37 18 Q. Okay. Were there sources of information,  
13:05:40 19 confidential secret sources of information within the  
13:05:44 20 PFLP between 1998 and 2002?

13:05:59 21 A. Secret sources?

13:06:01 22 Q. Yes.

13:06:03 23 A. For sure there was.

13:06:06 24 Q. Will you tell me who those secret sources  
13:06:09 25 were?

13:06:14 1 A. Who they are?

13:06:15 2 Q. Yes.

13:06:17 3 A. I'm not entitled to reveal in such matters.

13:06:22 4 Q. You said that the PFLP office in Kalkilya

13:06:27 5 re-opened in 2008?

13:06:32 6 A. Yes.

13:06:37 7 Q. Yes?

13:06:37 8 A. Yes.

13:06:40 9 Q. Do you know who re-opened that office?

13:06:46 10 A. The same two names that I already mentioned:

13:06:50 11 Margaret and Manala Rai, which is the wives of Shaher

13:06:54 12 and Yusef.

13:06:58 13 Q. And do you know who provided the funding for

13:07:01 14 that office when it re-opened in 2008?

13:07:12 15 A. No.

13:07:13 16 Q. Do you know -- you testified that you

13:07:15 17 understand the funding for the office to have been

13:07:17 18 cut off in 2002?

13:07:40 19 A. According to the internal -- internal

13:07:44 20 discussions among them, they say: We do not have

13:07:47 21 funds to run an office.

13:07:49 22 Q. Do you know who was funding them up until

13:07:51 23 that time in 2002 when the funding was cut off?

13:08:00 24 A. No.

13:08:02 25 Q. Are you aware that the PFLP has a website?

13:08:18 1 A. I personally did not have a look at it.

13:08:22 2 Q. Do you know that it exists?

13:08:26 3 A. I haven't seen it.

13:08:28 4 Q. Have you heard about it?

13:08:31 5 A. No. I am not into -- I am not into Internet

13:08:42 6 and electronics. That's not of much concern to me.

13:08:49 7 We have an IT unit that handles these matters.

13:08:55 8 Q. You testified earlier that you believe the

13:08:57 9 PFLP office in Kalkilya was involved with -- I think

13:09:02 10 the word you used was "social activities," but maybe

13:09:06 11 "political."

13:09:07 12 Is that your testimony?

13:09:27 13 A. Politically?

13:09:28 14 (Court reporter clarification.)

13:09:28 15 Q. BY MR. SCHOEN: What kind of activities do

13:09:33 16 you believe the PFLP office in Kalkilya was involved

13:09:38 17 with, again, let's say between 1998 and 2002?

13:09:53 18 A. Most of it was raising the flag of the PFLP,

13:10:02 19 reviving the memory of establishing the Front, the PFLP.

13:10:10 20 These are the public activities that are open to the

13:10:13 21 public.

13:10:15 22 Q. You are aware, sir, that since it began, the

13:10:18 23 PFLP has been involved with violent terrorist incidents;

13:10:24 24 correct?

13:10:25 25 MR. HIBEY: That presumes a fact not in

evidence. Objection. Objection.

THE WITNESS: The Popular Front in Kalkilya?

Q. BY MR. SCHOEN: The Popular Front for the Liberation of Palestine, the PFLP.

A. I don't know.

Q. You don't know whether the PFLP has ever been involved in a violent terrorist incident, action?

MR. HIBEY: Objection. That presumes facts not in evidence. I think you're now arguing with the witness. Objection.

MR. SCHOEN: I'm not pretending to argue. I'm asking him a question: "Do you know?" Okay?

MR. HIBEY: The question has been asked and answered.

Q. BY MR. SCHOEN: Do you know whether the PFLP has been involved in the past in violent terrorist actions?

A. I am not pursuing the case of the PFLP. I am here in order to witness over a case that is connected with my district.

Q. I'm asking you a question: As a security officer or as a Palestinian, are you aware that the PFLP has been involved in violent terrorist actions?

MR. HIBEY: Well, I'm going to object to that because it calls upon him to testify as other than a

13:12:20 1 30(b)(6) witness. His personal opinion or awareness  
13:12:25 2 is not relevant.

13:12:45 3 THE WITNESS: I do not have any information  
13:12:48 4 on such issues. My job, it is to monitor any behavior  
13:13:00 5 that might undermine public order in my governorate,  
13:13:07 6 my district.

13:13:10 7 Q. BY MR. SCHOEN: Do you ever monitor the PFLP?

13:13:14 8 A. All the political factions.

13:13:16 9 Q. I'm asking about the PFLP.

13:13:19 10 A. Yes, we do.

13:13:21 11 Q. Why do you monitor the PFLP?

13:13:24 12 A. The same answer. We also monitor the  
13:13:28 13 activities of Fatah. All the political activities,  
13:13:34 14 we monitor.

13:13:35 15 Q. Are you monitoring them for, among other  
13:13:39 16 reasons, to see whether they're involved in violent  
13:13:43 17 activity?

13:13:58 18 A. Any faction which is involved in violence  
13:14:01 19 or in terrorism, measures are taken to follow-up on  
13:14:06 20 them, even if it was Fatah.

13:14:09 21 Q. And is the PFLP one such organization?

13:14:15 22 A. Yes.

13:14:17 23 Q. Are you aware, sir, of the murder of the  
13:14:21 24 cabinet minister Ze'evi, Rehavam Ze'evi?

13:14:29 25 A. Of course I am.

13:14:31 1 Q. Do you know whether a PFLP member was involved  
13:14:35 2 with that murder?

13:14:43 3 A. To the best of my knowledge, those involved  
13:14:48 4 in this murder, they have been held by the GIS, and they  
13:14:56 5 were imprisoned in Jericho. And then the Israelis came  
13:15:02 6 and captured them. I did not conduct any investigation  
13:15:06 7 with them. I don't know them personally.

13:15:09 8 Q. Is Ahmed Sa'adat one such person?

13:15:16 9 A. That the intelligence have detained?

13:15:19 10 Q. That you were just describing as among the  
13:15:23 11 people the GIS detained in connection with the Ze'evi  
13:15:28 12 murder.

13:15:32 13 A. No. There were three others.

13:15:34 14 Q. Who were they?

13:15:36 15 A. I don't recall the names.

13:15:37 16 Q. And you don't know whether they were PFLP  
13:15:40 17 members?

13:15:42 18 A. I don't know.

13:15:43 19 Q. Do you know that Ahmed Sa'adat is the leader  
13:15:48 20 of the PFLP?

13:15:49 21 A. Yes, I do.

13:15:51 22 Q. Are you aware, sir, that Ahmed Sa'adat has  
13:15:56 23 written that the use of violence is permitted --

13:15:59 24 MR. HIBEY: Oh, I'm going to object. Wait  
13:16:01 25 a minute. I'm going to object to that.



13:16:04 1 The way you've framed it is total hearsay  
13:16:07 2 without any support whatsoever and certainly not in  
13:16:11 3 this record. And I respectfully object to your asking  
13:16:17 4 the question of that -- in that form.

13:16:30 5 THE WITNESS: No, I don't know.

13:16:35 6 Q. BY MR. SCHOEN: Have you ever written -- read  
13:16:38 7 anything that Ahmed Sa'adat has written?

13:16:45 8 A. I'm not interested in that.

13:16:49 9 Q. Are you familiar with political positions  
13:16:52 10 advocated by the PFLP?

13:17:02 11 A. Not at all.

13:17:03 12 Q. Are you familiar with the Ali Abu Mustafa  
13:17:07 13 Brigade?

13:17:16 14 A. I heard about it after the murder of Ra'ed  
13:17:18 15 Nazzal.

13:17:20 16 Q. What do you understand the Ali Abu Mustafa  
13:17:26 17 Brigade to have been?

13:17:30 18 A. According to the charges against Ra'ed Nazzal,  
13:17:41 19 it used to be the military wing of the PFLP.

13:17:48 20 Q. "Used to be"?

13:17:54 21 A. That was the charge against Ra'ed Nazzal, that  
13:17:57 22 he is a member of the military wing of the PFLP.

13:18:03 23 Q. Do you know if, between 1998 and 2002, there  
13:18:06 24 was a military wing of the PFLP?

13:18:24 25 A. In Kalkilya, I don't know.

13:18:26 1 Q. Anyplace, are you familiar with -- do you know  
13:18:33 2 whether there has existed at any time a military wing  
13:18:36 3 of the PFLP?

13:18:48 4 A. I don't know on this subject.

13:18:51 5 Q. Have you ever heard of a military wing of the  
13:18:53 6 PFLP?

13:19:03 7 A. No.

13:19:05 8 Q. Do you believe the PFLP is divided into two  
13:19:08 9 or more different wings?

13:19:16 10 A. I have no knowledge about the PFLP.

13:19:21 11 Q. Let's go to the rest of the documents you  
13:19:24 12 have. Are the rest of the documents --

13:19:31 13 A. But let me clarify a point, that 64 and 65  
13:19:35 14 complement each other. They are not separate.

13:19:42 15 Q. Okay. Are the rest of the documents through  
13:19:44 16 67 -- that would be 63 through 67 -- do they all relate  
13:19:55 17 to the Shaher Al-Rai and Hindi matters that you were --

13:20:02 18 A. Yes.

13:20:03 19 Q. Same thing -- kind of thing you were  
13:20:05 20 testifying about earlier, the Al-Hindi and Shaher  
13:20:07 21 Al-Rai?

13:20:08 22 A. Yes.

13:20:14 23 Q. So the rest of the documents, 63 through 67 --

13:20:21 24 A. The same topic.

13:20:23 25 Q. Same topic.

13:20:24 1 Any other relevance, those documents, to the  
13:20:29 2 Karnei Shomron attack?

13:20:32 3 A. No.

13:20:33 4 Q. Now, considering the documents 51 through 54  
13:20:39 5 that I showed you earlier, which we called Exhibit A,  
13:20:49 6 and the documents that we're calling Exhibit B, 63  
13:20:55 7 through 67, are there any other documents that you  
13:21:01 8 provided to the defense?

13:21:07 9 A. No.

13:21:07 10 Q. Mr. Dahbour, is it your testimony that of  
13:21:37 11 all of the files you reviewed in connection with this  
13:21:41 12 case, Exhibit A and Exhibit B represent the total body  
13:21:53 13 of documents that you provided to the defense?

13:22:02 14 A. Yes.

13:22:05 15 MR. SCHOEN: Then I have to ask Mr. Hibey  
13:22:08 16 if you know -- as I say, this morning, courtesy of  
13:22:14 17 Mr. O'Toole, we were provided with what we were told  
13:22:18 18 were the originals of the documents that were provided  
13:22:21 19 to us on September 10, 2012.

13:22:27 20 There is -- I'll represent there is a  
13:22:33 21 document in there that is not in among the documents  
13:22:37 22 we were given on September 12 -- September 10, 2012,  
13:22:45 23 and the originals don't have Bates stamps on them  
13:22:48 24 anyway. But a comparison of that document with the  
13:22:51 25 face of the documents that we were given indicates

13:22:55 1 that it was not a document that was given to us.

13:23:01 2 I just assume it was inadvertently left out  
13:23:07 3 of the documents that were given to us. But I'd like  
13:23:10 4 to examine the witness about it, and I don't have Bates  
13:23:15 5 stamped copies of it.

13:23:17 6 MR. HIBEY: I -- I'm a little confused by what  
13:23:21 7 you've just said. You're telling me that, on September  
13:23:25 8 10th, when we provided you with documents, there was one  
13:23:29 9 less document in it than what we brought to you today?

13:23:34 10 MR. SCHOEN: There was -- on September 10  
13:23:37 11 you all provided documents. Mr. McAleer provided  
13:23:41 12 documents Bates stamped 51 to 67, which I think is  
13:23:47 13 about 17 pages of documents. We see originals in the  
13:23:51 14 file that Mr. O'Toole gave us of the originals of those  
13:23:54 15 17 pages.

13:23:56 16 And then there is an additional document,  
13:23:58 17 which I'm assuming to be a document that you all  
13:24:02 18 intended to turn over to us, because it's in the group  
13:24:05 19 of originals of the documents that were turned over.

13:24:07 20 MR. O'TOOLE: Could we review that document?

13:24:11 21 MR. SCHOEN: Yes.

13:24:11 22 MR. O'TOOLE: It may have been inadvertent.

13:24:12 23 MR. SCHOEN: Yes. I believe it's a two-page  
13:24:14 24 document. (Indicating.)

13:24:20 25 MR. HIBEY: Maybe we need to step outside.

13:24:25 1 MR. O'TOOLE: Can we go off the record?

13:24:26 2 MR. SCHOEN: Go off -- go off the record.

13:24:26 3 THE VIDEOGRAPHER: Going off the record at  
13:24:29 4 1:25.

13:24:31 5 (Brief discussion held off the record.)

13:26:00 6 THE VIDEOGRAPHER: Back on the record at 1:26.

13:26:02 7 MR. HIBEY: Mr. Schoen, I appreciate your  
13:26:05 8 bringing this to our attention. Indeed, it is  
13:26:11 9 inadvertent.

13:26:11 10 These are the notes in ink, on the right-hand  
13:26:13 11 side, of one of our colleagues, John Eustice, whom you  
13:26:20 12 met yesterday. This is an inadvertent turnover of two  
13:26:29 13 pages that were given to us. In other words, it was  
13:26:35 14 created for us, and it would appropriately be the  
13:26:42 15 subject of a privilege log.

13:26:45 16 So I understand this was inadvertent. But  
13:26:50 17 I'm telling you that this should not have been turned  
13:26:54 18 over to you.

13:26:54 19 MR. SCHOEN: Let me ask you a question by  
13:26:55 20 way of full disclosure.

13:27:00 21 I have asked someone to summarize that  
13:27:03 22 document in the limited period of time we've had  
13:27:03 23 available today. So I am aware to some degree, in  
13:27:03 24 summary fashion, of what that document provides.

13:27:06 25 It certainly, in my view -- I'm characterizing

13:27:10 1 it -- provides information that would be directly  
13:27:12 2 relevant to this examination. And it provides a great  
13:27:15 3 deal more information about the bomber, Mr. Hafez, and  
13:27:19 4 his PFLP membership, from sources of information that  
13:27:24 5 we simply have not seen, because we haven't seen that  
13:27:28 6 information yet.

13:27:30 7 I would ask that that document be marked as  
13:27:33 8 an exhibit and then sealed, if that's what the defense  
13:27:37 9 wants. But for whatever purpose it might be used in  
13:27:42 10 the future, I believe it ought to be marked. And if  
13:27:45 11 the defense wants it to be sealed, it can be sealed.

13:27:50 12 Because I'm very troubled that we haven't  
13:27:52 13 been provided with the underlying information that's  
13:27:55 14 reflected in that document, as I understand the document  
13:27:58 15 to reflect, from the summary I was given of it.

13:28:09 16 I'm -- I'm also willing, by the way, to  
13:28:12 17 the extent the defense wants to cover up hand notes  
13:28:17 18 or something like that, to agree to that for these  
13:28:23 19 purposes.

13:28:25 20 I suppose I'd like to understand better. Are  
13:28:28 21 you saying that this is not a document -- no part of  
13:28:31 22 this document is a document produced from a file -- all  
13:28:36 23 of this document is some person on the defense team's --

13:28:40 24 MR. O'TOOLE: It's a document created by a  
13:28:44 25 client to report to attorney requests.

13:28:49 1 MR. SCHOEN: All right. So -- I mean, I  
13:28:49 2 understand, of course, why the defense would consider  
13:28:52 3 that to have a privileged nature.

13:28:56 4 On the other hand, I hope the defense  
13:28:58 5 understands why I would be very troubled that the  
13:28:58 6 client, whose depositions we've been trying to take,  
13:29:01 7 would have such information, which, in our view, if  
13:29:06 8 we understand the summary we have been provided, would  
13:29:08 9 clearly have been the subject of outstanding discovery  
13:29:11 10 requests due previously and these depositions. And I  
13:29:15 11 was, frankly, quite surprised to see that information  
13:29:19 12 in there.

13:29:20 13 That's why I would like to have it marked  
13:29:23 14 for possibly future litigation. But I understand,  
13:29:28 15 because the defense feels it's a privileged document,  
13:29:32 16 why sealing that document would be appropriate.

13:29:39 17 MR. HIBEY: Well, I would prefer that we  
13:29:44 18 retain the copy, as well as be assured that no copy  
13:29:50 19 has been made of this during the time the document  
13:29:54 20 has been in your possession. And I think you can be  
13:30:00 21 assured that the document will be retained -- this  
13:30:08 22 document which you handed me, which we inadvertently  
13:30:13 23 provided to you today -- retained by us for purposes  
13:30:19 24 of additional litigation you wish to wage concerning it.

13:30:26 25 So my first question is: Have you copied this

document during the time it was in your possession?

MR. SCHOEN: I'm not prepared to answer that at this time.

MR. HIBEY: Yeah.

MR. SCHOEN: I don't know the answer to that at this time.

MR. HIBEY: Well, perhaps you can consult with your local counsel and give me an answer, because I think that's important to know.

MR. SCHOEN: My first question is: Would you agree to mark the document for preservation purposes?

MR. HIBEY: I agree to mark the document for preservation purposes. I am not agreeable to it being out of our possession.

So it can be marked, and it would be retained by us on the representation that we've made that it will be retained for purposes of any future litigation.

But my other question remains unanswered at this time: Has this document been copied by your side during the time it has been in your possession?

MR. SCHOEN: Would you agree to turn the document over to a third party for custody?

MR. HIBEY: Well, I think I need to consider that only after I know the answer to the question I put to you. I put it to you three or four times.



13:31:45 1 I am prepared to infer that you have copied  
13:31:51 2 it. And I take it by your silence that you are  
13:31:57 3 affirming that the document has been copied.

13:32:01 4 MR. SCHOEN: Sir, you have no right to take  
13:32:03 5 anything from my silence. I've already told you that  
13:32:06 6 I don't know the answer to the question. So to infer  
13:32:10 7 otherwise is, quite frankly, to me, offensive.

13:32:14 8 MR. HIBEY: This is not -- no. It shouldn't  
13:32:15 9 be offensive.

13:32:15 10 MR. SCHOEN: Okay.

13:32:16 11 MR. HIBEY: It should be obvious to you that  
13:32:18 12 we've been here together for a number of hours, during  
13:32:21 13 which time you have had possession of this document.  
13:32:25 14 You cannot sit here across the table and plead ignorance  
13:32:29 15 to me about its disposition while it's been in the hands  
13:32:31 16 of your people.

13:32:32 17 You've got Mr. Haller there, and you've got  
13:32:35 18 a gentleman who apparently has been assisting in this  
13:32:40 19 particular examination. I want to know if you gentlemen  
13:32:43 20 have copied it.

13:32:45 21 Now, that's a pretty straightforward question,  
13:32:53 22 and I think the silence on that is deafening.

13:32:58 23 MR. SCHOEN: Again, you're entitled to think  
13:33:00 24 whatever you think. I don't intend silence to be any  
13:33:05 25 kind of answer at any time.

13:33:06 1 MR. HIBEY: Well, good for you. But I think  
13:33:09 2 you understand that, in the circumstances, the record  
13:33:12 3 can easily be read to infer that you have copied this  
13:33:16 4 document.

13:33:17 5 MR. SCHOEN: The record should infer that I  
13:33:20 6 refuse to answer your question at this time, not that  
13:33:22 7 there is any affirmative inference from that. I have  
13:33:26 8 told you I don't know the answer. So you shouldn't  
13:33:29 9 draw any affirmative inference from my silence.

13:33:32 10 MR. HIBEY: And I am imploring -- this is  
13:33:32 11 not personal, Mr. Schoen. You've got a side. I am  
13:33:37 12 imploring you -- you are surrounded by lawyers and  
13:33:39 13 consultants and somebody in the corner who is probably  
13:33:43 14 a lawyer as well. Talk to them. Ask them the question.

13:33:47 15 MR. SCHOEN: I may certainly be willing to do  
13:33:49 16 that. You said you're inferring an affirmative response  
13:33:52 17 from my silence.

13:33:54 18 MR. HIBEY: Only because I've asked it five  
13:33:55 19 times of your side, not of you.

13:33:56 20 MR. SCHOEN: I have no obligation to answer  
13:33:58 21 any question you ever ask me, with all due respect.

13:34:02 22 MR. HIBEY: All right. All right, then.  
13:34:02 23 That's the position you take. I just needed to  
13:34:05 24 understand that very clearly on this record.

13:34:11 25 MR. SCHOEN: Now, I am willing to go off

13:34:13 1 the record and discuss it with the other people at  
13:34:16 2 the table here.

13:34:18 3 MR. HIBEY: Thank you.

13:34:19 4 THE VIDEOGRAPHER: Going off the record at  
13:34:20 5 1:35.

13:34:22 6 (Recess from 1:35 p.m. to 1:45 p.m.)

13:34:22 7 THE VIDEOGRAPHER: Back on the record at 1:45.

13:45:08 8 MR. SCHOEN: Mr. Hibey, I'm -- I'm now going  
13:45:11 9 to provide you with a full account of what I understand  
13:45:15 10 transpired with respect to the document we're talking  
13:45:17 11 about and our position on it. Mr. O'Toole certainly  
13:45:20 12 is here with us to correct anything I've said that's  
13:45:23 13 wrong factually.

13:45:26 14 We were given the documents this morning  
13:45:30 15 in an envelope by Mr. O'Toole. Mr. O'Toole gave it  
13:45:34 16 to Mr. Haller. We understood these documents to be  
13:45:38 17 the originals of the documents that Mr. McAleer --  
13:45:42 18 Mr. O'Toole, you're not recording this on there, are  
13:45:45 19 you?

13:45:48 20 MR. O'TOOLE: I'm not recording this.

13:45:49 21 MR. SCHOEN: Okay. Is someone else on the  
13:45:49 22 telephone?

13:45:49 23 MR. O'TOOLE: No, I'm actually looking at the  
13:45:53 24 Federal Rules of Civil Procedure 26(b).

13:45:56 25 MR. SCHOEN: Not my business. What is it?

13:45:57 1 MR. O'TOOLE: I'll talk about it when you're  
13:45:59 2 done.

13:46:00 3 MR. SCHOEN: Sure. We were given the  
13:46:03 4 documents -- let me back up.

13:46:05 5 I understand that yesterday a request  
13:46:06 6 was made to Mr. O'Toole to provide the originals  
13:46:09 7 of the documents that Mr. McAleer e-mailed to us on  
13:46:12 8 September 10th, because certain of the documents we  
13:46:15 9 received were illegible. And it was our hope that  
13:46:18 10 the originals would be more legible.

13:46:20 11 Mr. O'Toole, as I understand it, agreed to  
13:46:23 12 that request and, this morning, handed Mr. Haller an  
13:46:26 13 envelope which he represented to be the originals of  
13:46:29 14 the documents that Mr. McAleer had e-mailed to us on  
13:46:34 15 September 10, 2012.

13:46:36 16 When mister -- the understanding was,  
13:46:38 17 Mr. Haller had, that Mr. O'Toole not only intended for,  
13:46:44 18 but told Mr. Haller, that these documents should all be  
13:46:50 19 copied, with the originals to be returned to the defense  
13:46:52 20 team. Mr. Haller then copied all of the documents. And  
13:46:56 21 the documents, as a matter of course, were distributed  
13:46:58 22 to other members of the defense team.

13:47:03 23 MR. HIBEY: Of the --

13:47:04 24 MR. SCHOEN: Of the defense team.

13:47:10 25 MR. HIBEY: Distributed here to other members

13:47:12 1 of the plaintiffs' team?

13:47:14 2 MR. SCHOEN: Oh.

13:47:15 3 MR. O'TOOLE: "Plaintiffs."

13:47:15 4 MR. SCHOEN: I absolutely misspoke on the  
13:47:18 5 record. I meant to say the plaintiffs' team. I'm  
13:47:22 6 used to being on the other side and doing defense work.

13:47:26 7 They were distributed to members of the  
13:47:27 8 plaintiffs' team as a matter of course.

13:47:30 9 You and Mr. Hibey have now advised us that  
13:47:34 10 this document we're talking about, this two-page  
13:47:38 11 document, was a document that was not among the  
13:47:41 12 documents -- you believe was not among the documents --  
13:47:43 13 and I think we all agree was not among the documents  
13:47:47 14 that Mr. McAleer e-mailed to us on September 10, 2012.

13:47:54 15 I understand you to have described this  
13:47:58 16 delivery to us as the inadvertent delivery of a  
13:48:04 17 privileged document, privileged because it is a  
13:48:07 18 document created by your client for you.

13:48:14 19 After a review of the document, we believe,  
13:48:17 20 respectfully, that the document is not properly  
13:48:19 21 a privileged document and what occurred was the  
13:48:23 22 inadvertent disclosure of a non-privileged document,  
13:48:26 23 which we believe on its face -- perhaps with the  
13:48:29 24 exception of what you have described as the handwritten  
13:48:32 25 notes of Mr. Eustice -- and there clearly are what

13:48:36 1 appear to be handwritten notes in blue ink on the top  
13:48:41 2 right margin of the document. We believe it to be a  
13:48:45 3 pre-existing document that should have been disclosed  
13:48:47 4 to us and that contains important material information  
13:48:51 5 supportive of the plaintiffs' case that has been  
13:48:54 6 improperly withheld from us, both the document itself  
13:48:57 7 and the underlying information.

13:48:59 8           We would like to show this document to the  
13:49:01 9 witness and ask the witness if he can identify the  
13:49:04 10 document and ask the witness with a -- I don't know  
13:49:09 11 what language the document's written in. I think the  
13:49:13 12 document is written in Arabic. If the document is  
13:49:16 13 written in Arabic, I would ask the witness to identify  
13:49:20 14 the document, if he can. And in any event, I would  
13:49:23 15 like to examine him about the contents of this document,  
13:49:26 16 because I believe the document reflects non-privileged  
13:49:31 17 fully relevant information that properly ought to be  
13:49:34 18 the subject of this examination.

13:49:38 19           And one reason that I say we believe the  
13:49:40 20 document to be a pre-existing document and a document  
13:49:43 21 of non-privileged character is that, in form and in  
13:49:50 22 content, to a great degree, it resembles other documents  
13:49:56 23 that have been disclosed in this case. And I say  
13:49:59 24 just in form and in character. I don't speak about  
13:50:04 25 the substance of it. It appears to be similar to

13:50:08 1 or identical to the nature and character and form of  
13:50:12 2 other documents that we understand to be pre-existing  
13:50:16 3 documents taken from the files and produced to us from  
13:50:19 4 the defense.

13:50:22 5 We would like to examine the witness about  
13:50:24 6 the document. We believe we are entitled to it and  
13:50:27 7 that we will be prejudiced if we're not able to on this  
13:50:34 8 occasion. If we're not permitted to examine the witness  
13:50:37 9 on this document, we certainly intend to seek sanctions,  
13:50:39 10 including a reconvening of the deposition with the  
13:50:41 11 payment of all associated expenses by the defense.

13:50:45 12 And what we would propose to do is -- I've  
13:50:47 13 already asked you to make the document an exhibit to  
13:50:51 14 this deposition, kept under seal, if you like. We  
13:50:55 15 also would like to have this document -- maintain this  
13:51:02 16 document in a confidential manner. And this case is  
13:51:05 17 subject to a confidentiality order already.

13:51:08 18 We would keep it in a manner consistent with  
13:51:11 19 the terms of that confidentiality order, in order, among  
13:51:15 20 other things, to litigate the propriety or impropriety  
13:51:20 21 of having withheld this document from us and the  
13:51:24 22 propriety or impropriety of our having this document  
13:51:28 23 and the underlying information.

13:51:29 24 If you just give me one second, I'll see  
13:51:32 25 if there's anything else I wanted to say about this.

1 I've tried to make this point in my remarks  
2 that I made. But, in any event, when I say we would  
3 keep the document in a confidential manner, we certainly  
4 would be amenable to having the document sequestered, as  
5 that term is used in the Federal Rules, and specifically  
6 in Rule 26, I believe is the relevant rule. I think I'm  
7 referring to 26(b)(5)(B).

8 MR. O'TOOLE: Correct.

9 (Court reporter clarification.)

10 MR. SCHOEN: We would sequester the document  
11 and keep it certainly sequestered, and in all regards,  
12 subject to the confidentiality order.

13 That's all I have to say about it.

14 MR. O'TOOLE: I think, first, just to correct  
15 a couple of things with respect to what happened that  
16 I'm sure were inadvertent.

17 But I believe yesterday, during the  
18 deposition, Mr. Haller asked Mr. Eustice to provide  
19 these copies. Because of the logistics today with  
20 the possible deposition in Ramallah, Mr. Eustice  
21 prepared a -- Mr. Eustice prepared a file in response  
22 to Mr. Haller's request. I delivered the file to  
23 Mr. Haller this morning.

24 We were not aware that this document was  
25 among the documents that was included in the file.



13:53:02 1 Any disclosure was completely inadvertent and related  
13:53:06 2 to a document that we believed to be attorney/client  
13:53:09 3 privileged.

13:53:10 4 Immediately after we learned of the  
13:53:12 5 inadvertent disclosure, when you told us, we immediately  
13:53:15 6 have notified you that the disclosure was inadvertent,  
13:53:18 7 that the privilege -- that the documents, we believed,  
13:53:18 8 were privileged.

13:53:19 9 And we are now requesting, after being  
13:53:24 10 notified, that you promptly return -- well, you have  
13:53:27 11 returned the document -- and sequester or destroy the  
13:53:29 12 specified information in any copies it has, that you  
13:53:32 13 cannot use or disclose the information until the claim  
13:53:35 14 is resolved, and you must take reasonable steps to  
13:53:39 15 retrieve any information, if the party has disclosed  
13:53:42 16 the information beyond -- to others before being  
13:53:44 17 notified, which it sounds like from your description  
13:53:49 18 you may have done with respect to your consulting  
13:53:51 19 experts.

13:53:52 20 And we would suggest that we would mark this  
13:53:55 21 and, to the extent that any claim is raised disputing  
13:53:59 22 our claim of privilege, that we will promptly present  
13:54:01 23 this document under seal to the court for determination  
13:54:05 24 of the claim.

13:54:09 25 MR. SCHOEN: Two brief things in response.

1 I think you just misspoke. You said that  
2 Mr. Haller asked Mr. Eustice for these copies. I think  
3 you meant the originals.

4 MR. O'TOOLE: For the originals, to the  
5 extent that we have them. Because I think we gave you  
6 the documents we were given. But I believe that those  
7 documents were probably copies.

8 MR. SCHOEN: Yes. Yes, I understand.

9 MR. HALLER: I actually asked Mr. McAleer.  
10 I think I e-mailed you all and asked for better copies.  
11 And then Mr. Eustice approached me and said that the  
12 copies will be brought today.

13 MR. O'TOOLE: I think that's -- I'm sure  
14 that's accurate. I wasn't involved in it until this  
15 morning, when I delivered the envelope.

16 MR. SCHOEN: It seems to me, if we were  
17 to narrow our differences, the differences, as I  
18 could identify them, would be that, among other  
19 things, you're asking us to destroy all copies of  
20 the document that we have. And I don't think that  
21 would be appropriate, especially when what you would  
22 have proposed and all you're willing to do in response  
23 to my request is to mark the document as an exhibit and  
24 to deliver the document to a third party. It certainly  
25 would not be appropriate for us to destroy the document.

1 Again, what we're willing to do is sequester  
2 the document, maintain it in a fully confidential form,  
3 fully subject to the confidentiality order in this case  
4 in all regards.

5 But what we're not willing to do -- again,  
6 especially because what we believe the nature of the  
7 document to be and what we believe to be the impropriety  
8 of withholding this document and the contents of this  
9 document, we would not be comfortable in knowing that  
10 all copies other than the physical document that sits  
11 before you right now had been destroyed.

12 MR. HIBEY: Do you have a copy of this  
13 document?

14 MR. SCHOEN: Does the -- does our team have  
15 a copy of this document? Is what you're asking?

16 MR. HIBEY: Yes.

17 MR. SCHOEN: Yes.

18 MR. HIBEY: Do you have multiple copies of the  
19 document?

20 MR. SCHOEN: The document has been distributed  
21 to other members on the defense team.

22 MR. HIBEY: On the --

23 MR. SCHOEN: The plaintiffs' team.

24 MR. HIBEY: We think that the rule, as  
25 Mr. O'Toole has quoted it, governs this situation.

1 And therefore, on this record, we are requesting  
2 that you return all copies of this document, which  
3 we maintain was inadvertently turned over to you, so  
4 that we may have all copies of the questioned material.

5 MR. O'TOOLE: Can I add one point here?

6 To the -- to the extent that the rule  
7 permits sequestration, the rule is also very clear  
8 that any party who sequesters cannot use or disclose  
9 the information and has to take reasonable steps to  
10 make sure that it is not used or disclosed.

11 And so I think I want to make very clear,  
12 this is -- this is a document that you can't look at  
13 at this point. The only thing you can do is retrieve  
14 copies and put it in an envelope to the -- because that  
15 is sequestration. It's not you keep it and hang on to  
16 it for what -- for whatever use you want to make of it.  
17 The rules are very clear. You can't use it.

18 MR. SCHOEN: Our proposal is to sequester  
19 the document as a remedy, not to destroy the document.

20 We intend to litigate this issue. As I say,  
21 we intend to litigate the issue in the context of a  
22 sanctions motion and our entitlement to the document,  
23 among other issues. So we are not willing to destroy  
24 the document. We are willing to sequester the document,  
25 as the term is used in the applicable Federal rule.

13:57:58 1 MR. O'TOOLE: We believe that destruction  
13:57:59 2 would be the better remedy. But, obviously, we're not  
13:58:03 3 going to be able to forcibly take the documents from  
13:58:06 4 you, so I think we'll have to litigate.

13:58:11 5 MR. SCHOEN: I don't think the rule  
13:58:11 6 expresses a preferable remedy between sequestration  
13:58:15 7 and destruction. But in any event, to the extent it  
13:58:16 8 does, we believe the rule gives a choice.

13:58:17 9 We believe the appropriate and only  
13:58:18 10 appropriate choice in this case would be sequestration  
13:58:19 11 until this matter is resolved and certainly keeping the  
13:58:25 12 document in all regards subject to the confidentiality  
13:58:30 13 order.

13:58:31 14 MR. HIBEY: Well, insisting on sequestration  
13:58:33 15 on your part is only one aspect of this. The  
13:58:36 16 information contained therein cannot be used and  
13:58:41 17 cannot be disseminated. And, therefore, that is  
13:58:46 18 simply what shall be the case until such time as  
13:58:49 19 this issue is resolved by the court or resolved  
13:58:55 20 otherwise.

13:58:56 21 I don't think you can take from this document  
13:59:00 22 or from the record that we've attempted to make here  
13:59:07 23 that this is any document other than what we represented  
13:59:11 24 it to be. And it is clear to me that there is a strong  
13:59:16 25 suggestion on your part that it is as we construe it,

1 because you most kindly brought it to our attention.

2 MR. SCHOEN: Let me respond to that again,  
3 Mr. Hibey.

4 You continue, it seems to me, to engage  
5 in the practice of trying to read my mind or infer  
6 something that's simply neither accurate nor fair.

7 I explained to you when I disclosed the  
8 document to you --

9 MR. HIBEY: Perhaps --

10 MR. SCHOEN: Let me finish, please -- why I  
11 disclosed the document to you. It seemed --

12 MR. HIBEY: Perhaps -- I'm sorry. Go ahead.

13 MR. SCHOEN: You go ahead.

14 MR. HIBEY: Perhaps I should always say "you  
15 all" when I speak to you, Mr. Schoen. I don't speak  
16 to you personally. I'm talking about the side.

17 MR. SCHOEN: In this case -- I appreciate  
18 that. But, in this case, I wasn't responding  
19 personally. I was responding as a side.

20 I don't know, frankly, what's in anybody  
21 else's mind. I do know the reason that I first  
22 raised this with you before I showed it to the witness.  
23 The reason is because it didn't appear, as I compared  
24 documents with the Bates stamped documents, that this  
25 was one of those documents. My conclusion from that

14:00:22 1 was to, in my view, give you the benefit of the doubt.

14:00:25 2 I didn't believe it was a privileged document.

14:00:28 3 I thought that, when you folks gave us  
14:00:31 4 documents, you carefully reviewed whatever documents  
14:00:34 5 were given to us and that those documents were documents  
14:00:38 6 you believed had been given to us.

14:00:40 7 And, therefore, if I didn't examine on that  
14:00:43 8 document, would take the position that we had all of  
14:00:46 9 the information that's contained in that document and  
14:00:48 10 that, if we had wanted to examine this witness on that  
14:00:51 11 information, we should have done it. After all, it was  
14:00:53 12 in the envelope of documents we gave to you today, and  
14:00:58 13 we wouldn't have given you documents unless we intended  
14:01:00 14 for you to see those documents.

14:01:01 15 So that's why, as a precaution, I simply asked  
14:01:02 16 you first, drew it to your attention, but not because  
14:01:07 17 I believed it to be a privileged document. And I don't  
14:01:10 18 think it's either fair or appropriate for you to infer  
14:01:13 19 some kind of mal intent or some kind of belief that you  
14:01:17 20 have no basis for making.

14:01:19 21 I've explained to you, and to the extent you  
14:01:22 22 come to any other conclusion, you're simply questioning  
14:01:25 23 my representation, which you're entitled to do.

14:01:30 24 MR. HIBEY: Well, I'm trying hard not  
14:01:32 25 to question your representation, because I'm still

14:01:37 1 grateful for the fact that you brought this matter  
14:01:41 2 to our attention.

14:01:43 3 But, unfortunately, now that the point has  
14:01:46 4 been pressed as it has been in the colloquy that we've  
14:01:48 5 been having, I think it's important for your side to  
14:01:56 6 advise the record as to when, after we arrived here  
14:02:02 7 this morning and turned these materials over to you,  
14:02:06 8 it was realized by your side that there were two pages  
14:02:10 9 more than what we have otherwise indicated or otherwise  
14:02:19 10 provided you on the 10th of September. And --

14:02:22 11 MR. SCHOEN: Well --

14:02:22 12 MR. HIBEY: Just hear me out.

14:02:29 13 MR. SCHOEN: Yes. Sure.

14:02:29 14 MR. HIBEY: It would seem to me that at that  
14:02:27 15 point -- at that point, someone who realized that there  
14:02:32 16 were two pages more might have brought this to our  
14:02:36 17 attention, rather than causing somebody on your side  
14:02:43 18 who can read Arabic to read it, to copy it, and then,  
14:02:49 19 only hours later, bring it to our attention in the  
14:02:55 20 fashion that it was done.

14:02:57 21 MR. SCHOEN: Two things. I can assure you  
14:02:59 22 this document was not copied and distributed before  
14:03:03 23 anyone realized that it was anything other than what  
14:03:05 24 we understood it to be, that is, a set of originals  
14:03:10 25 of the documents we had been provided. It was handed



14:03:11 1 as a set. That set was copied and distributed. I'm  
14:03:15 2 not going to inquire of every member of the team as  
14:03:18 3 to when each person recognized there were two extra  
14:03:22 4 documents.

14:03:22 5 We approached this document in the manner  
14:03:25 6 we believe appropriate. We're suggesting a remedy we  
14:03:29 7 believe appropriate. And from our perspective, that's  
14:03:32 8 the end of it.

14:03:34 9 MR. HIBEY: Well, you have our position.

14:03:36 10 MR. SCHOEN: Sure. Okay. I'd now like to  
14:03:40 11 show the document to the witness and examine the witness  
14:03:44 12 about the document that we've been discussing.

14:03:57 13 MR. HIBEY: I'm not altogether comfortable  
14:04:00 14 with that at this time. I would like to take time off  
14:04:03 15 the record to consider the request.

14:04:05 16 MR. SCHOEN: Of course.

14:04:05 17 MR. HIBEY: We don't need much time, but --

14:04:10 18 MR. SCHOEN: Of course.

14:04:14 19 THE VIDEOGRAPHER: Going off the record at  
14:04:14 20 2:05.

14:15:50 21 (Recess from 2:05 p.m. to 2:16 p.m.)

14:15:53 22 THE VIDEOGRAPHER: Back on the record at 2:16.

14:16:01 23 MR. HIBEY: We've had the opportunity to  
14:16:03 24 consult.

14:16:06 25 We think that there ought to be questioning

14:16:11 1 regarding the nature of this document, not its content,  
14:16:17 2 put to the witness in aid of an ultimate determination  
14:16:23 3 as to whether these pages are privileged. That being  
14:16:32 4 the case, I propose that questioning of the witness at  
14:16:41 5 this time on that subject be made.

14:16:49 6 In addition, since it is we who are asserting  
14:16:53 7 the privilege, I propose to be the first to ask the  
14:17:03 8 witness questions concerning the document.

14:17:09 9 MR. SCHOEN: My response is this: First  
14:17:11 10 of all, I would not concede in any regard that  
14:17:15 11 these questions and answers would be the ultimate  
14:17:18 12 determination, as I believe you put it, as to whether  
14:17:20 13 the document is privileged. And I also believe that  
14:17:25 14 we should be able to conduct the examination, since  
14:17:28 15 it's our deposition, and go first.

14:17:31 16 I was wondering -- I wanted to ask you two  
14:17:34 17 questions if I could, Mr. Hibey. Obviously, you're  
14:17:36 18 under no obligation to answer.

14:17:39 19 MR. HIBEY: Yes.

14:17:39 20 MR. SCHOEN: One would be: When you obtained  
14:17:41 21 this document? And the second would be: Who has had  
14:17:45 22 access to the document and who translated it for  
14:17:50 23 Mr. Eustice to make those handwritten notes?

14:17:55 24 MR. HIBEY: Yes. I believe this document  
14:17:58 25 came into our possession at around the time of the

14:18:02 1 materials which had been turned over for use.

14:18:07 2 MR. SCHOEN: Around September 10th?

14:18:09 3 MR. HIBEY: Yes.

14:18:11 4 Secondly, the translation that is reflected  
14:18:17 5 here was part of our attempting to understand this, the  
14:18:24 6 content of this material.

14:18:28 7 MR. SCHOEN: My question was: Who provided  
14:18:30 8 that translation in order for mister -- you said, I  
14:18:34 9 believe, those are Mr. Eustice's handwritten notes.

14:18:37 10 MR. O'TOOLE: We believe they are.

14:18:39 11 MR. SCHOEN: Yes. I don't believe Mr. Eustice  
14:18:41 12 reads and understands Arabic.

14:18:43 13 MR. HIBEY: No, I'm not saying he was the  
14:18:46 14 translator. He was the benefit of the translation.  
14:18:52 15 And sitting here right now --

14:18:55 16 MR. O'TOOLE: I'm not sure about the answer  
14:18:57 17 to that, and I wouldn't want to speculate.

14:19:01 18 MR. HIBEY: I'm not sure I know.

14:19:05 19 Now, I don't think that the fact that this  
14:19:09 20 is a noticed deposition on your part justifies your  
14:19:20 21 going first and asking questions of the witness, since  
14:19:24 22 the burden is going to be on us in court, if it comes  
14:19:29 23 to that. And that's what I meant by the ultimate  
14:19:33 24 determination. If it comes to that, the burden is  
14:19:36 25 on us. So I would like very much to be the first

14:19:41 1 to inquire of the witness regarding these two pages.

14:20:00 2 MR. SCHOEN: The concern -- the concern is  
14:20:03 3 that leading questions will be put to the witness that  
14:20:07 4 really can't be retracted and that the --

14:20:11 5 MR. HIBEY: Let me ask you something.

14:20:12 6 Is that your -- now I'm being personal. Is  
14:20:15 7 that your concern?

14:20:17 8 MR. SCHOEN: Number one, I would never  
14:20:19 9 disclose if there were -- I don't know about "ever."  
14:20:22 10 I'm not disclosing whether any differences in our  
14:20:27 11 team exist, but that's my position.

14:20:34 12 MR. HIBEY: I'm going first. This is my  
14:20:37 13 burden.

14:20:41 14 MR. SCHOEN: I don't agree to that. But  
14:20:44 15 I can't stop you, I don't think.

14:20:48 16 MR. HIBEY: All right. Let's mark this  
14:20:51 17 as Sealed Exhibit Number 1.

14:20:54 18 Is that fair?

14:20:55 19 (Court reporter clarification.)

14:22:57 20 (I. Dahbour Sealed Exhibits 1 and 1A marked.)

14:23:02 21 MR. HIBEY: You had a question of me, sir?

14:23:02 22 MR. SCHOEN: Yeah.

14:23:02 23 MR. HIBEY: Please place that before the  
14:23:02 24 witness.

14:23:07 25 MR. SCHOEN: I just want to ask you a

question, if you feel free to respond.

Is it your position that this witness generated this document and had it provided to you?

MR. HIBEY: It is my understanding that the witness provided the information that is contained on this document.

MR. SCHOEN: To someone else who then --

MR. HIBEY: To our investigator, yes, who is part of our --

MR. SCHOEN: If you insist on going forward and asking your question, go ahead and ask your question.

MR. HIBEY: Sure.

I want to show you, Mr. Dahbour, Sealed Exhibit 1 and 1A.

CHECK INTERPRETER HAZOU: Dov, can you raise your voice, please?

OFFICIAL INTERPRETER RABINOVITCH: I will.

CHECK INTERPRETER HAZOU: Thank you.

MR. HIBEY: I'm going to ask you to read it to yourself.

First of all, do you recognize that document?

THE WITNESS: (Examining.) No.

MR. HIBEY: Does it contain --

THE WITNESS: As a document, no. As a

14:25:50 1 document, no, I'm not familiar.

14:25:53 2 MR. SCHOEN: I would object to any further  
14:25:55 3 questions on this document once the witness has said  
14:25:58 4 he doesn't recognize the document.

14:26:01 5 MR. HIBEY: I understand.

14:26:01 6 Your answer was "as a document, no."

14:26:08 7 Do you have any other information to state  
14:26:13 8 regarding your understanding of the material contained  
14:26:16 9 in that document?

14:26:18 10 MR. SCHOEN: Objection. Objection as to form.  
14:26:26 11 Vague and otherwise objectionable.

14:26:36 12 THE WITNESS: Shall I answer?

14:26:38 13 MR. HIBEY: Yes.

14:26:39 14 MR. SCHOEN: First of all, I'm not in a  
14:26:41 15 position to direct him not to answer. I don't have  
14:26:43 16 that authority.

14:26:44 17 MR. HIBEY: Please answer.

14:26:48 18 THE WITNESS: After I read these two pages  
14:26:50 19 in front of me, most of the information is available  
14:26:57 20 within our security files.

14:27:06 21 There are maybe additional details about  
14:27:09 22 his brothers, his sisters. But he was being with  
14:27:19 23 Jamal Al-Hindi and Ra'ed Nazzal, accompanied by.  
14:27:26 24 And Rafi Nasura -- he was like a picture by Rafi.  
14:27:39 25 His pictures were taken by Rafi Nasura before the

operation was conducted.

MR. HIBEY: Okay. We're going beyond where I want to be.

OFFICIAL INTERPRETER AGHAZARIAN: "We are going beyond where I want to be."

MR. HIBEY: We're not going to stand in the way of your questioning of the witness regarding this document. We -- we know, as lawyers, how it was created. And I am telling you that it is a document that was created for us. But since the witness cannot identify the document per se as a document, then I am afraid we will go forward.

MR. SCHOEN: Thank you, Mr. Hibey.

Q. BY MR. SCHOEN: Mr. Dahbour, if you would, please, take the first page of that document --

MR. HIBEY: By the way, the marginalia, we agree, is definitely our work product?

MR. SCHOEN: Certainly. First of all, it's not readable. But I certainly wasn't going to examine on it.

MR. HIBEY: You can't read it.

MR. SCHOEN: But we're certainly not going to use that.

THE WITNESS: I don't know English -- I'm reading -- that well.

14:28:50 1 Q. BY MR. SCHOEN: If you do know English, don't  
14:28:52 2 look at what's written in English on the side. Okay?

14:28:55 3 A. I'm ready. Please go ahead.

14:29:08 4 Q. Tell me -- describe the document for me,  
14:29:11 5 starting from the top.

14:29:13 6 MR. HIBEY: Oh, excuse me. You just -- you  
14:29:14 7 made a very trenchant statement earlier that this is  
14:29:19 8 a document he cannot identify.

14:29:22 9 MR. SCHOEN: No. I don't mean describe the  
14:29:24 10 contents of the document. I'm asking him to tell me  
14:29:27 11 what the document says.

14:29:29 12 Q. BY MR. SCHOEN: Tell me what the document  
14:29:31 13 says, specifically. Read the document. That's the  
14:29:35 14 easiest thing. Read the Arabic on the document.

14:29:44 15 A. I may read the content in Arabic, but I don't  
14:29:47 16 know where this document comes from.

14:29:49 17 Q. Fine. I'm not asking you where it comes from.  
14:29:52 18 I'm asking you what it says.

14:30:00 19 Redacted  
14:30:01 20  
14:30:22 21  
14:30:31 22  
14:30:43 23  
14:30:43 24  
14:30:48 25



Redacted

MR. SCHOEN: Okay. I don't have any -- I don't have any further questions.

MR. HIBEY: All right. If you give me a minute to consult, and we'll go from there.

THE VIDEOGRAPHER: Going off the record at 3:09.

(Recess from 3:09 p.m. to 3:11 p.m.)

MR. HIBEY: All right. We have no questions.

THE VIDEOGRAPHER: Going back on the record at 3:11.

MR. HIBEY: We still have no questions.

We reserve the right to continue to contest the use of the document that was the subject of the discrete inquiry here in the middle of this man's deposition. And so you are on notice that that's our position.

MR. SCHOEN: Respectfully, we disagree with

15:11:34 1 the validity of that position.

15:11:36 2 That's all I have to say. Thank you.

15:11:39 3 MR. HIBEY: All right. I think we're done.

15:11:41 4 MR. SCHOEN: Now, do we need to discuss  
15:11:43 5 housekeeping on the record or not?

15:11:44 6 THE VIDEOGRAPHER: That concludes the video  
15:11:46 7 deposition at 3:12.

15:11:48 8 (Brief discussion held off the record.)

15:14:06 9 MR. HIBEY: Back on the record. And it's okay  
15:14:07 10 if this is not on the video record.

15:14:09 11 The court reporter will please note that the  
15:14:11 12 contested exhibit, Sealed Deposition Exhibit 1 and 1A,  
15:14:18 13 will be retained by defense counsel pendente lite.

15:14:29 14 MR. SCHOEN: And to be consistent, it is our  
15:14:32 15 position it should be retained by the court reporter,  
15:14:36 16 just our position, as I said earlier.

17 (The deposition concluded at 3:14 p.m.)  
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## 1 CERTIFICATE OF WITNESS/DEPONENT

2  
3 I, IBRAHIM DAHBOUR, witness herein,  
4 do hereby certify and declare the within and foregoing  
5 transcription to be my examination under oath in said  
6 action taken on September 12, 2012, with the exception  
7 of the changes listed on the errata sheet, if any;

8 That I have read, corrected, and do hereby  
9 affix my signature under penalty of perjury to said  
10 examination under oath.

11  
12  
13  
14  
15 \_\_\_\_\_  
16 IBRAHIM DAHBOUR, Witness

\_\_\_\_\_ Date

CERTIFICATE OF REPORTER

I, AMY R. KATZ, RPR, do hereby certify:

That, prior to being examined, the witness named in the foregoing deposition was duly affirmed by me to testify to the truth, the whole truth, and nothing but the truth;

That the foregoing deposition was taken before me at the time and place herein set forth, at which time the aforesaid proceedings were stenographically recorded by me and thereafter transcribed by me;

That the foregoing transcript, as typed, is a true record of the said proceedings;

And I further certify that I am not interested in the action.

Dated this 15th day of October, 2012.

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AMY R. KATZ, RPR

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ERRATA SHEET

\*\*\* SHABTAI SCOTT SHATSKY, et al., v.

THE SYRIAN ARAB REPUBLIC, et al. \*\*\*

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IBRAHIM DAHBOUR, Witness

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Date

SEPTEMBER 12, 2012 - IBRAHIM DAHBOUR

<b>A</b>				
<b>Abbas</b> 154:19,20 154:23	110:17 <b>actual</b> 21:10	145:20,24 146:3 146:6,16,19	58:3 59:10,18,25 83:12,18 84:9	<b>anyway</b> 40:12 78:23 114:24
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